

I. Meeting Packet



State of Florida
Public Service Commission
INTERNAL AFFAIRS AGENDA

Tuesday – November 04, 2025
Immediately Following Agenda Conference
Room 105 – Gerald L. Gunter Building

1. Draft Report on Florida Lifeline Assistance (Attachment 1)
2. Draft Report on FPSC Efforts to Reduce Regulatory Assessment Fees for Telecommunications Companies (Attachment 2)
3. Draft 2025 Ten Year Site Plans Review (Attachment 3)
4. Draft 2025 Status Report on Storm Protection Plan Activities of Florida Investor-Owned Utilities (Attachment 4)
5. Draft 2025 Annual Report on Activities Pursuant to the Florida Energy Efficiency and Conservation Act (Attachment 5)
6. Legislative Update
7. General Counsel's Report
8. Executive Director's report
9. Other Matters

BB/aml

OUTSIDE PERSONS WISHING TO ADDRESS THE COMMISSION ON
ANY OF THE AGENDAED ITEMS SHOULD CONTACT THE
OFFICE OF THE EXECUTIVE DIRECTOR AT (850) 413-6463.

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

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

DATE: October 22, 2025

TO: Braulio L. Baez, Executive Director

FROM: Office of Industry Development & Market Analysis (Day, Deas, Mallow, CH
Fogleman)
Office of External Affairs (Crump, Thompson) DF

RE: 2025 Annual Lifeline Report Regarding the Number of Customers Subscribing to Lifeline Service and the Effectiveness of any Procedures to Promote Participation.

CRITICAL INFORMATION: ACTION IS NEEDED – Please place on the November 4, 2025 Internal Affairs agenda. **Commission approval of the draft Lifeline Report is sought.** The 2025 Lifeline Report is due to the Governor, President of the Senate, and Speaker of the House by December 31, 2025.

Staff is seeking Commission approval of the draft 2025 Annual Lifeline Report detailing the number of customers subscribing to Lifeline Service and the effectiveness of procedures to promote participation. The report also describes state and federal regulatory action impacting the Lifeline program and Lifeline Awareness promotions in Florida.

Section 364.10(2)(h), Florida Statutes, requires the FPSC to provide this report to the Governor, President of the Senate, and Speaker of the House of Representatives by December 31 of each year.

Attachment

cc: Mark Futrell, Deputy Executive Director, Technical
Apryl Lynn, Deputy Executive Director, Administrative
Adria E. Harper, General Counsel

DRAFT



A report to the
Governor
President of the Senate
Speaker of the House of Representatives



December 2025

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List of Acronyms

C.F.R.	Code of Federal Regulations
DCF	Department of Children and Families
ETC	Eligible Telecommunications Carrier
FCC	Federal Communications Commission
FPSC	Florida Public Service Commission
F.S.	Florida Statutes
GB	Gigabytes
Mbps	Megabits per second
MHz	Megahertz
NARUC	National Association of Regulatory Utility Commissioners
NCPW	National Consumer Protection Week
SAC	Study Area Code
SNAP	Supplemental Nutrition Assistance Program (formerly Food Stamps)
USAC	Universal Service Administrative Company
U.S.C.	United States Code
USF	Universal Service Fund
WAC	The Special Supplemental Nutrition Program for Women, Infants, and Children

Executive Summary

The Florida Lifeline Assistance report is prepared pursuant to the requirements in Section 364.10(2)(g), Florida Statutes (F.S.). The Florida Public Service Commission (FPSC or Commission) is required to report to the Governor, the President of the Senate, and the Speaker of the House of Representatives each year on the number of customers subscribing to Lifeline service and the effectiveness of procedures to promote participation in the program.

The Lifeline program is designed to enable low-income households to obtain and maintain telephone and broadband services by offering qualifying households a discount on their monthly bills. Alternatively, consumers can choose to receive monthly wireless minutes and/or measured data service from certain wireless providers. This report presents Lifeline participation data from July 2024 through June 2025, and evaluates procedures put in place to strengthen the Lifeline program.

As of June 30, 2025, there were a total of 332,887 Florida households participating in the Lifeline program, an increase of 120,644 households from last year. This represents that approximately 1 of every 27 Florida households are participating in the Lifeline program.¹ The Supplemental Nutrition Assistance Program (SNAP) continues to be the largest qualifying program for Lifeline assistance in Florida. However, only 20 percent of SNAP participants subscribe to Lifeline as of June 2025.² Using SNAP participation as a proxy for the number of Lifeline eligible households suggests that there continues to be significant growth opportunities for Lifeline enrollment. It should be noted that only carriers that have been designated as an eligible telecommunications carrier (ETC) are permitted to provide the Lifeline discount. If a customer's preferred carrier is not an ETC, they may be less likely to participate in the program if it requires switching providers.

"Stay Connected, Florida!" was the slogan for Florida's 2025 Lifeline Awareness Week, held on September 8–14. This year's Lifeline Awareness Week continued efforts to increase awareness and enrollment in the Lifeline program.

¹ Florida Legislature Office of Economic and Demographic Research, Demographic Estimating Conference, Florida Households, released July 30, 2025, <http://edr.state.fl.us/Content/conferences/population/ConferenceResultsTables.pdf>, accessed on October 10, 2025, p. 2, Households 9,282,611.

² Florida DCF, Access Florida: Standard Data Reports by Caseload, <https://www.myflfamilies.com/services/public-assistance/additional-resources-and-services/ess-standard>, accessed on October 10, 2025.

I. Lifeline Program

The Lifeline program has provided phone service discounts for qualifying low-income consumers since 1985.³ The Lifeline program would later be codified with the passage of the Telecommunications Act of 1996. Initially, the program goal was to ensure that all Americans had the opportunity and security that phone service provides. In 2016, that goal was expanded by the Federal Communications Commission (FCC) to include broadband service.

One of the principles of the universal service program as described in the Telecommunications Act of 1996 is that consumers in all regions of the Nation, including low-income consumers and those in rural or high cost areas, should have reasonably comparable access to telecommunications and information services at rates that are reasonably comparable to those charged in urban areas.⁴ The federal Lifeline program supports the goal of universal service by providing a monthly discount for services to qualifying households, thereby ensuring that low-income households have access to modern communications networks capable of providing voice and broadband service.⁵

Qualifying households can receive up to a \$9.25 discount on their monthly phone or broadband bills from wireline service providers that have been designated as ETCs. Alternatively, consumers can choose to receive monthly wireless minutes and measured data service from designated wireless ETCs. Although some of Florida's wireless ETCs offer a free cell phone along with Lifeline service, the distribution of wireless devices is not funded by the Lifeline program.

Support for the Lifeline program comes from the federal Universal Service Fund (USF), which also provides funding for the high-cost, rural healthcare, and schools and libraries programs. Lifeline is available to eligible low-income households in every state and territory, as well as federally recognized Tribal lands.

The rules governing the Lifeline program are established by the FCC; however, the FCC has designated the Universal Service Administrative Company (USAC), an independent not-for-profit corporation, as the program's administrator. USAC is responsible for data collection, maintenance, support calculation, and disbursement of support for the Lifeline program along with other federal USF programs. USAC also administers the National Verifier, which determines customer eligibility for the Lifeline discount. The FPSC has oversight over the Lifeline program in Florida pursuant to Section 364.10, F.S.

³ The Lifeline program was originally established by the Federal Communications Commission by order in 1985 to ensure that low-income consumers had access to affordable, landline telephone service in the wake of the divestiture of AT&T. See MTS and WATS Market Structure, and Amendment of Parts 67 & 69 of the Commission's Rules and Establishment of a Joint Board, Report and Order, 50 Fed. Reg. 939, released January 8, 1985.

⁴ 47 U.S.C. § 254(b)(3).

⁵ FCC, Third Report and Order, WC Docket No. 11-42, FCC 11-42, released April 27, 2016, <https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf>, accessed on October 15, 2025.

A. Eligibility

Consumers can qualify to participate in the Lifeline program either through program-based or income-based eligibility standards. Program-based eligibility is determined by a customer's enrollment in specific qualifying programs that were selected by the FCC. Customers can qualify for the Lifeline program by being enrolled in any one of the following programs:

- SNAP
- Medicaid
- Federal Public Housing Assistance
- Supplemental Security Income
- Veterans or Survivors Pension Program
- Bureau of Indian Affairs Programs: Tribal Temporary Assistance to Needy Families, Head Start Subsidy, and National School Lunch Program

Consumers whose total household income is less than 135 percent of the Federal Poverty Guidelines can participate in the Lifeline program under the income-based standard. The Federal Poverty Guidelines are updated annually and can be found in Appendix A.

In addition to these eligibility criteria established by the FCC, Congress, through the Safe Connections Act of 2022, provided for Lifeline benefits for survivors of domestic violence. Under this Act, survivors may receive emergency Lifeline support for up to six months. To qualify, applicants must first request that their phone company separate their line from the abuser's account. The company will then provide documentation that the lines have split into separate accounts. Survivors must also participate in one of the Safe Connections Act specific programs, which include:

- The Special Supplemental Nutrition Program for Women, Infants, and Children;
- The Free and Reduced-Price School Lunch or Breakfast program; or
- Receipt of a Federal Pell Grant in the current award year.

Income-based eligibility for domestic violence survivors is also expanded to include incomes at or below 200 percent of the Federal Poverty Guidelines.⁶

B. Application Process

Consumers have several methods by which they can apply to receive Lifeline benefits:

- Through USAC's website using the National Verifier consumer portal
- In person with certain ETCs using the National Verifier service provider portal
- By mailing their application to USAC's Lifeline Support Center
- Through ETC websites that have access to the National Verifier

⁶ USAC, Survivor Benefits, <https://www.lifelinesupport.org/survivor-benefit/>, accessed on October 15, 2025.

Eligibility is validated by the National Verifier through available automated eligibility data sources. Applications are checked to confirm identity, verify that the consumer is not already a Lifeline participant, and ensure compliance with all program rules. If eligibility cannot be validated through automated sources, customers can upload supporting documentation to the National Verifier portal or mail it to the Lifeline Support Center. Those that qualify must then contact a participating provider in their area to enroll in the Lifeline program.

In Florida, USAC's National Verifier connects to the Florida Department of Children and Families (DCF) database to confirm customer eligibility through SNAP or Medicaid. At the national level, it also interfaces with the U.S. Department of Housing and Urban Development and the U.S. Department of Veterans Affairs.⁷ In 2024, these automated connections allowed the National Verifier to confirm eligibility for nearly 94 percent of all applicants who qualified for Lifeline.⁸

C. Minimum Service Standards

To be eligible for USF support, ETC's are required to provide broadband access that meets minimum service standards established by the FCC, unless they are granted forbearance from this obligation. These standards are reviewed annually through an FCC update mechanism to ensure that Lifeline customers continue to receive viable service options as technology improves.⁹ However, there has not been an increase in minimum service standards in the past several years, in part because the FCC determined that raising the standards would likely impose costs that would ultimately be imposed on Lifeline customers.¹⁰ The current minimum service standards include:

- 1,000 minutes per month of mobile voice
- 4.5 gigabytes per month of mobile broadband
- Fixed broadband speed of 25 megabits per second (Mbps) downstream and 3 Mbps upstream, with 1.23 terabytes per month of data usage

D. Duplicate Lifeline Support

Eligible consumers can only receive one Lifeline-supported service per household.¹¹ If there are two households residing at one address and each desire to participate in the Lifeline program, each applicant must complete USAC's Household Worksheet form. This form is used to

⁷ USAC, Eligibility Verification, <https://www.usac.org/lifeline/national-verifier/eligibility-verification/>, accessed on October 15, 2025.

⁸ USAC, National Verifier Annual Report and Data, released January 31, 2025, <https://www.usac.org/wp-content/uploads/lifeline/documents/nv/reports/2025-National-Verifier-Annual-Report-and-Data.pdf>, accessed on October 15, 2025, p. 5.

⁹ FCC, Public Notice, WC Docket No. 11-42, DA 23-621, released July 30, 2024, <https://docs.fcc.gov/public/attachments/DA-24-740A1.pdf>, accessed on October 15, 2025.

¹⁰ FCC, Order, WC Docket No. 11-42, DA 25-567, released July 1, 2025, <https://docs.fcc.gov/public/attachments/DA-25-567A1.pdf>, accessed on October 13, 2025.

¹¹ 47 C.F.R. § 54.409(c).

demonstrate that each applicant is living in a separate economic unit and not sharing income or living expenses (bills, food, etc.) with another resident.¹²

To prevent waste in the program, the FCC created a National Lifeline Accountability Database and mandated its use to ensure that multiple ETCs do not seek and receive reimbursement for the same Lifeline subscriber.¹³ This database conducts a nationwide real-time check to determine if the consumer or another person at the address of the consumer is already receiving Lifeline service. States have read-only access to this database to help prevent waste, fraud, and abuse of the Lifeline program.

E. Non-Usage Rule

In general, wireless ETCs offer Lifeline service for no additional cost beyond the support provided by the universal service program. While customers can elect to purchase additional minutes or data usage at their discretion, the program pays ETCs to provide a basic level of service.

To address potential waste that could occur if support is received for cell phones that are no longer functional or that may have been owned by a customer who is now deceased, the FCC has established rules regarding support for Lifeline connections with no usage. Specifically, if an ETC does not assess or collect a monthly fee from the customer over and above the support received from USF, the Lifeline customer must use the Lifeline-supported service at least once every 30 days. Usage is defined by the FCC as the customer completing one of the following:

- Completing an outgoing call or using data
- Sending a text message
- Buying minutes or data to add to the subscriber's service plan
- Answering an incoming call (calls from the customer's Lifeline service provider, Lifeline service customer's agent, or representative do not apply)
- Responding to direct contact from the customer's Lifeline service provider to confirm the subscriber wants to continue receiving Lifeline service

If the Lifeline customer does not use their service for 30 consecutive days (non-usage), the ETC must give the customer a 15-day notice that if they do not use the service it will be terminated. ETCs must de-enroll those Lifeline customers who do not meet the usage requirement within the final 15-day grace period. Consumers de-enrolled from the Lifeline program for non-usage may reapply at any time by submitting an application to USAC.

¹² USAC, Household Eligibility Pre-Screening Tool, www.lifelinesupport.org, accessed on October 15, 2025.

¹³ FCC, Report and Order, WC Docket No. 11-42, FCC 12-11, released February 6, 2012, <https://docs.fcc.gov/public/attachments/FCC-12-11A1.pdf>, accessed on October 15, 2025.

II. Regulatory Activities and Updates

A. Federal Communications Commission Activities

1. Phase Out of Voice-Only Support

On April 27, 2016, the FCC released its Lifeline Modernization Order.¹⁴ This Order was primarily established to modernize the Lifeline program by including broadband as a supported service and establishing the National Verifier. In the Order, the FCC also established a timeline to gradually phase out support for voice-only services to make the program broadband-focused. Support for voice-only Lifeline service was scheduled to be completely phased out on December 1, 2021. However, the FCC has delayed the complete phase out of voice-only Lifeline support several times. In its most recent Order, the FCC stated that support for voice-only Lifeline services will continue to be available through December 1, 2026.¹⁵ The FCC noted that this extension is partly due to the ongoing reliance of Lifeline subscribers on voice services. In Florida, as of June 2025, there were 923 Lifeline households that continue to subscribe to a voice-only service. In comparison, USAC reported a national total of 114,838 voice-only Lifeline customers for the same month.¹⁶ Standalone broadband plans or bundled broadband and voice plans will continue to be eligible for Lifeline support after the new phase-out date. Table 1 outlines the FCC's revised phase down schedule.

Table 1
Lifeline Support Transition Schedule

Effective Dates	Voice	Broadband & Broadband / Voice
From 12/1/19 to 11/30/20	\$7.25	\$9.25
From 12/1/20 to 12/1/26	\$5.25	\$9.25
After 12/1/26	\$0	\$9.25

Source: FCC, Order (DA 25-567)

The 2016 Lifeline Modernization Order included an exception to the complete phase-down of voice-only support in census blocks where there is only one Lifeline provider. On June 1, 2021, the FCC released a public notice identifying the census blocks eligible to continue receiving the \$5.25 support amount for voice-only Lifeline service.¹⁷ The list of eligible census blocks will be evaluated annually by the FCC, and if a census block is determined to be served by more than one Lifeline provider, the discount will be discontinued on December 1st of that year. In the most recent data published by USAC, only 11 census blocks qualify for the continued voice-only

¹⁴ FCC, Third Report and Order, WC Docket No. 11-42, FCC 16-38, released April 27, 2016, <https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf>, accessed on October 15, 2025.

¹⁵ FCC, Order, WC Docket No. 11-42, DA 24-642, released July 3, 2024, <https://docs.fcc.gov/public/attachments/da-24-642A1.pdf>, accessed on October 15, 2025.

¹⁶ USAC, Lifeline Disbursement Tool, <https://opendata.usac.org/Lifeline/Lifeline-Disbursements-Tool/rink-mije>, accessed on October 10, 2025.

¹⁷ FCC, Public Notice, DA 21-640, released June 1, 2021, <https://docs.fcc.gov/public/attachments/DA-21-640A1.pdf>, accessed on October 15, 2025.

support in Florida. This applies to areas within four ZIP codes in Citrus, Hillsborough, Jefferson, and Lafayette counties.¹⁸

B. Florida Public Service Commission Activities

1. Prevention of Waste, Fraud, & Abuse of the Universal Service Fund

The FPSC remains committed to enforcing safeguards to prevent waste, fraud, and abuse of the USF. Protecting the integrity of the Lifeline program in Florida is a priority, and the FPSC takes appropriate enforcement action when necessary. With statutory authority to grant and revoke wireline and wireless ETC designations, the FPSC actively monitors federal USF disbursements to Florida's ETC's, ensuring funds are used in compliance with state and federal regulations.

On January 12, 2025, Q LINK Wireless's ETC designation was revoked by the Florida Public Service Commission for committing fraud within the Lifeline program.¹⁹ Q LINK had 15,429 Lifeline customers when its ETC designation was revoked. After Q Link Wireless lost its ETC designation, Lifeline customers were serviced by either Global Connection of America (d/b/a StandUp Wireless) or Assurance Wireless. Customers were not bound to either of these Lifeline companies, and were able to select another provider.

2. Recent ETC Designations

During this reporting period, the FPSC approved a number of ETC petitions from wireline and wireless carriers. Since Legislative changes in 2011, the Commission has only had authority to address ETC petitions from wireline carriers. However, in 2024 the Legislature amended Section 364.10, F.S., to once again expand the FPSC's jurisdiction to grant ETC designation to wireless carriers for Lifeline purposes only. These recent ETC designations are listed below.

Wireless

- Air Voice Wireless, LLC
- American Broadband and Telecommunications Company LLC
- Amerimex Communications Corp.
- Boomerang Wireless, LLC
- DISH Wireless L.L.C.
- Florida Terracom Inc.
- Global Connection Inc. of America
- IM Telecom, LLC
- TAG Mobility, LLC
- Telrite Corporation
- Tempo Telecom, LLC
- TruConnect Communications, Inc.

¹⁸ USAC, Program Data, <https://www.usac.org/lifeline/resources/program-data/>, accessed on October 15, 2025.

¹⁹ FPSC, Docket No. 20240146-TP, Document No. 09700-2024, issued October 28, 2024, and Document No 00097-2025, Final Order, PSC-2024-0479-PAA-TP, issued January 7, 2025.

Wireline

- Integrated Path Communications, LLC

3. Assurance Wireless Amended ETC Petition

On April 15, 2025, the FPSC approved an amended ETC petition from Assurance Wireless, granting the company a Lifeline-only statewide ETC designation. This amendment specifically added three new wire center areas where Assurance Wireless previously did not hold ETC designation. Assurance Wireless was initially granted a Lifeline-only ETC designation on July 12, 2010.²⁰ That designation covered specific Florida wire centers served by AT&T, Frontier Florida (formerly Verizon), and CenturyLink.²¹

4. Lifeline Promotion Process

The Lifeline Promotion Process is a computer interface connecting the FPSC, DCF and Florida ETC's to provide information to Medicaid and SNAP participants interested in the Lifeline discount. This process requires the DCF applicant to first express an interest in receiving the Lifeline discount and select an ETC. The selected ETC then contacts the customer to determine if they have already been approved for the Lifeline program through the National Verifier. If the customer has been approved, the ETC provides the Lifeline discount.

For customers who have not yet applied for Lifeline, the ETC or the FPSC sends instructions on how to apply using the National Verifier. Between January and November 2025, the FPSC sent 14,174 such letters to eligible households. In comparison, during the same period in 2024, the FPSC mailed 53,807 letters, with a total of 59,353 sent throughout last year. This significant decrease is attributed to ETCs assuming more responsibility for sending letters to prospective customers and DCF updating its list of companies offering Lifeline for applicants to select. These changes are estimated to have saved the agency approximately \$30 thousand so far for 2025.²²

5. Lifeline Promotion Activities

Promotional activities in 2025 featured National Lifeline Awareness Week, National Consumer Protection Week, and ongoing grassroots efforts to increase awareness and enrollment in the Lifeline program.

The FPSC works with other state commissions, the National Association of Regulatory Utility Commissioners (NARUC), and the FCC to promote National Lifeline Awareness Week and to educate consumers on the nationwide implementation of USAC's National Eligibility Verifier. These coordinated efforts help ensure that low-income households are aware of the Lifeline program, understand eligibility and annual recertification requirements, and recognize that only

²⁰ Prior to the Sprint/T-Mobile merger, Assurance Wireless was "Virgin Mobile USA, L.P." For more information on the initial petition, see Docket No. 20090245-TP.

²¹ FPSC, Docket No. 20240147-TP.

²² Estimated savings are calculated by comparing the full 2024 Lifeline mailing costs against the costs incurred from January to November 2025.

one discount is available per household. The shared goal is for every eligible household to enroll and receive the benefits of the Lifeline program.

The FPSC takes part in community events and continually seeks new opportunities to share Lifeline educational materials and engage with consumers. To maximize outreach and accessibility, the FPSC conducts events both in person and virtually.

a. National Lifeline Awareness Week

NARUC and the FCC designate the week following Labor Day each year as National Lifeline Awareness Week. For Florida's 2025 observance, held September 8–14, the theme was "*Stay Connected, Florida!*" The initiative aimed to raise awareness among eligible residents while continuing to educate consumers about available discounts on voice and broadband services, as well as household eligibility and recertification requirements. Florida's 2025 outreach efforts focused on senior and community centers in Jefferson, Broward, and Nassau Counties. Additionally, Lifeline program information remains available year-round on the FPSC's website.²³

b. National Consumer Protection Week

National Consumer Protection Week (NCPW), observed March 2–8, 2025, served as a valuable platform for Lifeline outreach initiatives. NCPW is an annual consumer education campaign led by the FCC that encourages individuals to understand and safeguard their consumer rights. For more than a decade, the FPSC has partnered with government agencies, advocacy groups, and private-sector organizations nationwide to promote this event.

In recognition of the 27th Annual NCPW, the FPSC highlighted its free energy efficiency and water conservation resources to help consumers make informed financial decisions. During NCPW 2025, the FPSC engaged directly with consumers in Hillsborough, Pinellas, and Leon Counties providing information on Lifeline and other Commission resources. A virtual outreach session was also held with a senior organization in Broward County to expand accessibility and reach.

c. Older Americans Month

Each May, the Commission takes part in Older Americans Month, a nationwide initiative that honors and recognizes the contributions of older adults to their families, communities, and society. The 2025 theme, "*Flip the Script on Aging*," guided this year's observance.

The FPSC partnered with community centers in Holmes, Washington, Madison, Volusia, and Duval Counties to engage directly with seniors and distribute information on the Lifeline program and strategies for reducing utility bills. To broaden its reach, the FPSC also hosted a virtual outreach event with a senior organization in Monroe County.

²³FPSC, Lifeline Assistance, <https://www.psc.state.fl.us/lifeline-assistance-program>, accessed on October 9, 2025.

d. Library Outreach Campaign

As part of its ongoing consumer education initiatives, each May the FPSC provides public libraries across Florida with educational packets containing Commission publications, along with Lifeline brochures and applications in both English and Spanish.

In 2025, the Library Outreach Campaign reached 570 libraries and branches statewide via email. Following the campaign, many libraries requested additional printed materials from the FPSC to continue distributing consumer resources throughout the year.

e. Ongoing Lifeline Outreach

Facilitating access to Lifeline information through agencies and organizations that regularly serve eligible consumers remains a key component of the FPSC's Lifeline awareness efforts. The FPSC collaborates year-round with numerous partners to ensure consumers are informed about the program and understand the application process. Each month, the FPSC sends a cover letter and Lifeline informational packet to two organizations encouraging continued outreach to their eligible clients. In addition, the Commission hosts monthly in-person and virtual events, including train-the-trainer sessions, to further promote Lifeline.

To recognize exceptional collaboration, the FPSC designates select partner agencies and organizations as "Helping Hands" for their contributions to public awareness of the Lifeline program, energy and water conservation, and the prevention of utility impersonation scams. In 2025, the Neighborly Senior Care Network was honored as a Helping Hand partner.

f. Lifeline Partners

The local, state, and federal agencies, organizations, businesses, and telecommunications companies listed in Appendix B play an essential role in the collaborative effort to expand awareness and participation in the Lifeline program. These Lifeline Partners actively support outreach by fostering new partnerships, participating in community events, offering training sessions, sharing updates on program changes, and distributing brochures and applications to consumers.

III. Lifeline Providers

Congress has granted state commissions the authority to designate carriers as ETCs if they meet certain requirements.²⁴ Conversely, state commissions may rescind ETC designation should a company fail to follow the Lifeline program requirements. In instances where a state commission lacks jurisdiction to grant ETC status, the FCC may make the designation.²⁵

To qualify as an ETC, a telecommunications carrier must offer services supported by federal USF program.²⁶ A company applying for designation as an ETC must demonstrate that it is financially and technically capable of providing Lifeline service.²⁷ The services can be provided either using its own facilities or a combination of its own facilities and another carrier's resold service, and they must advertise the availability of such services and charges. Companies that exclusively resell services may seek forbearance for the facilities requirement from the FCC. The majority of ETCs that utilize the facilities and services of other carriers are wireless providers. A list of wireless ETCs and the underlying wireless network they use can be found in Appendix C.

When the Telecommunications Act of 1996 was initially implemented, all ETCs were eligible to participate in the high-cost program and were required to offer Lifeline services. Since then, the FCC has revised its rules to allow companies to request ETC designation to participate in the Lifeline program only and forgo participation in the high-cost programs. Appendix D identifies the 31 ETCs in Florida as of June 30, 2025, by technology. Appendix D also includes enrollment data between 2023 and 2025.

As previously noted in Chapter II, thirteen companies were granted ETC designation this reporting period. Three of these newly designated ETCs, IM Telecom, Tempo Telecom, and Florida Terracom, were not providing Lifeline service in Florida as of June 2025. These companies have reported that they had not yet received a Study Area Code (SAC) number from USAC, which is required in order to provide Lifeline service. Additionally, two of the three companies have pending changes to their ownership or corporate structures that, if executed, will require them to resubmit their ETC petitions to the FPSC to maintain ETC status.

A. Funding Distributions

Only carriers that have been designated as an ETC can be reimbursed for the Lifeline discount from the USF. Figure 1 reflects the monthly USAC Lifeline disbursements to ETCs in Florida during the past two reporting periods. The total amount disbursed between July 2024 and June 2025 was \$36.02 million, representing an increase of \$8.4 million from the last reporting period. These amounts include prior period support corrections.

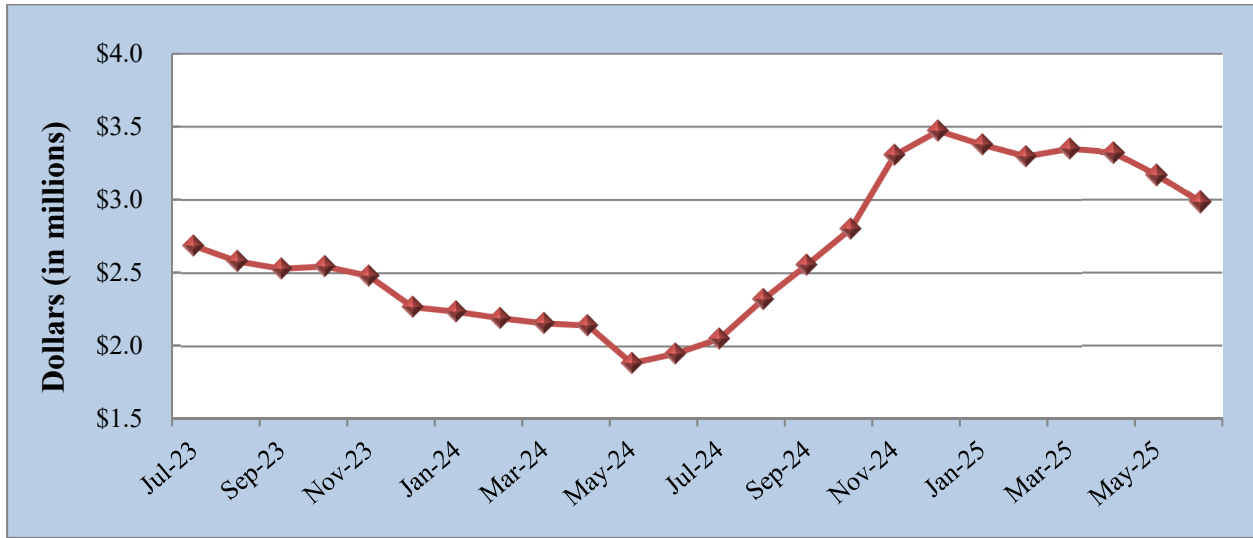
²⁴ 47 U.S.C. § 214(e)(2).

²⁵ 47 U.S.C. § 214(e)(6).

²⁶ 47 C.F.R. § 54.101.

²⁷ 47 C.F.R. § 54.201(h).

Figure 1
Lifeline Disbursements to Florida ETCs



Source: USAC disbursements for Florida: July 2023 - June 2025.

Between July 2024 and June 2025, thirteen wireless companies seeking ETC status in Florida were granted designations. These new designations, which expanded Lifeline subscribership, contributed to a disbursement peak of \$3.47 million in December 2024. As of June 2025, wireless ETCs received approximately 99.4 percent of all Lifeline disbursements from USAC in Florida.

B. Lifeline Service Obligations by Technology

ETCs can meet their Lifeline service obligations either through offering voice, broadband, or a combination of both services. Table 2 shows the percent of Lifeline subscription by service type and the underlying technology used by the ETC. Currently, wireless ETCs primarily offer bundled services that meet the federal standards for both voice and broadband. In contrast, many wireline ETCs, which have historically reported primarily voice-only customers, have rebranded as high-speed internet providers, resulting in a noticeable increase in broadband-only subscribership for this carrier type. Florida's single satellite ETC has just one Lifeline customer that receives a broadband-only service.

Table 2
Lifeline Subscription by Service Type
(As of June 2025)

Technology	Voice	Broadband	Bundled
Wireless	0%	0%	100%
Wireline	37.29%	37.25%	25.45%
Satellite	0%	100%	0%

Source: Industry Responses to 2025 FPSC Data Requests

As noted in Table 2, all wireless customers were on bundled plans as of June 2025. This trend is driven by the fact that only two wireless carriers, Mediacom and enTouch Wireless, still offer voice-only and broadband-only services. Appendix E provides the percentage of Lifeline subscriptions by service type for each carrier.

C. Wireless Service Standards

All wireless ETCs that are currently offering Lifeline services in Florida meet the minimum FCC standards by offering either a minimum of 1,000 voice minutes or 4.5 gigabytes (GB) of data to Lifeline subscribers. These providers offer plans at no cost to the Lifeline consumer; however, customers can elect to purchase additional voice minutes, data, or upgrade their services by selecting alternate plans. Table 3 outlines the different Lifeline services that are offered by Wireless ETCs at no cost to the Lifeline subscriber and their compliance with federal standards.

Table 3
Minimum Service Standards by Wireless ETC
(As of June 2025)

Brand (ETC)	Minimum Standards Met	Voice (Minutes)	Data (GB)
Access Wireless (i-Wireless)	Voice/Data	1,000	4.5
AirTalk Wireless (Air Voice)	Voice/Data	Unlimited	5
American Assistance (American Broadband)	Voice/Data	Unlimited	4.5
USA Phone (American Broadband)	Voice/Data	Unlimited	5
Assurance Wireless	Voice/Data	1,000	4.5
enTouch (Boomerang Wireless)	Plan 1: Voice Plan 2: Data	Plan 1: 1,000 Plan 2: 300	Plan 1: 0.1 Plan 2: 4.5
Gen Mobile (DISH Wireless)	Voice/Data	1,000	4.5
Life Wireless (Telrite Corp.)	Voice/Data	Unlimited	4.5
SafeLink (Verizon Value)	Voice/Data	Unlimited	10
StandUp (Global Connection)	Voice/Data	1,000	4.5
TAG Mobile (Tag Mobility)	Voice/Data	Unlimited	5
TruConnect	Voice/Data	Unlimited	4.5

Source: Industry Responses to 2025 FPSC Data Requests / Websites

Not all wireless ETCs offer plans at no cost to the customer. Mediacom offers Lifeline customers a discounted rate rather than a free plan, with a standalone voice-only plan starting at \$29.99. Meanwhile, Verizon Value brands (TracFone, Total Wireless, Straight Talk, Simple Mobile, and Walmart Family Mobile) offer Lifeline customers a monthly \$10.00 discount on any of its plans that offer more than 6 GB of data.²⁸

D. Carrier-Supplied Cell Phone

Some wireless ETCs offer cell phones at no cost to new Lifeline customers as part of their standard offerings. In these cases, the devices must also be accessible to customers with disabilities at no additional charge.²⁹ ETCs are not reimbursed for providing these phones and may choose to lock the devices, limiting their usability should the Lifeline subscriber choose to switch providers.³⁰ As shown in Table 4, five ETCs have reported offering Lifeline customers a cell phone. Two additional carriers indicated that cell phones may be offered during promotional periods.

Table 4
ETCs Offering Free Cell Phones
(As of June 2025)

Brand (ETC)	Provided
AirTalk Wireless (Air Voice)	Year-Round
StandUp (Global Connection)	Year-Round
TAG Mobile (Tag Mobile)	Year-Round
Life Wireless (Telrite Corp.)	Year-Round
TruConnect	Year-Round
enTouch (Boomerang Wireless)	Promotional Periods Only
Gen Mobile (DISH Wireless)	Promotional Periods Only

Source: Industry Responses to 2025 FPSC Data Requests

²⁸ As opposed to Verizon Value's SafeLink brand shown in Table 4.

²⁹ FCC, Order, DA-24-633, released July 8, 2024, <https://docs.fcc.gov/public/attachments/DA-24-633A1.pdf>, accessed on October 15, 2025.

³⁰ FCC, Cell Phone Unlocking, last updated/reviewed January 14, 2025, <https://www.fcc.gov/consumers/guides/cell-phone-unlocking>, accessed on October 15, 2025.

E. ETC Updates

1. Tempo Telecom, LLC's Proposed Acquisition by Insight Mobile, Inc.

In April 2024, Tempo Telecom notified the FPSC of a pending update to its FCC compliance plan in connection to a proposed transaction with Insight Mobile. The proposed transaction would result in Insight Mobile owning 100 percent of Tempo Telecom.³¹ However, on September 12, 2025, the FCC denied the updated compliance plan, citing concerns that Insight Mobile lacks the financial and technical capabilities required to participate in the Lifeline program. As a result, the FCC ruled that Tempo Telecom may continue to offer Lifeline services nationwide on the condition that the company is not acquired by Insight Mobile.³²

2. TracFone, Inc.'s Name Change to Verizon Value, Inc.

On April 7, 2025, TracFone submitted a name change application to the Florida Department of State to change its name to Verizon Value, Inc.³³ The company has held an ETC designation since 2008, initially offering Lifeline solely under the SafeLink Wireless brand. In 2024, the company informed the FPSC that it now provides Lifeline service under a total of six brand names: SafeLink Wireless, TracFone, Total Wireless, Straight Talk, Simple Mobile, and Walmart Family Mobile. The company's recent name change to Verizon Value, Inc. will distinguish the corporate entity responsible for providing the services from its individual brand names.

3. Verizon to Acquire Frontier

On September 5, 2024, Verizon announced its intent to acquire the parent company of two wireline ETCs in Florida, Frontier Florida and Frontier of the South.³⁴ These companies offer Lifeline services through their wireline network throughout their respective service territories. On May 16, 2025, the FCC approved the transaction, stating that it does not find any material transaction-related public interest harms arising from acquisition.³⁵ Once completed, Verizon will be the only parent company with subsidiaries that are both wireline and wireless ETCs in Florida.³⁶

³¹ FPSC, Tempo's ETC petition, Docket No. 20240069, Document No. 02128-2024, filed April 19, 2024.

³² FCC, Order, DA 25-850, released September 12, 2025, <https://docs.fcc.gov/public/attachments/DA-25-850A1.pdf>, accessed on October 15, 2025.

³³ Florida Department of State, TracFone Name Change Application, filed April 7, 2025. <https://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2025%5C0409%5C47436515.Tif&documentNumber=F07000005034>, accessed on October 6, 2025.

³⁴ Verizon, "Verizon to acquire Frontier," released September 5, 2024, <https://www.verizon.com/about/sites/default/files/Frontier-Press-Release.pdf>, accessed on October 13, 2025.

³⁵ FCC, DA 25-421, released May 16, 2025, <https://docs.fcc.gov/public/attachments/DA-25-421A1.pdf>, accessed on October 13, 2025.

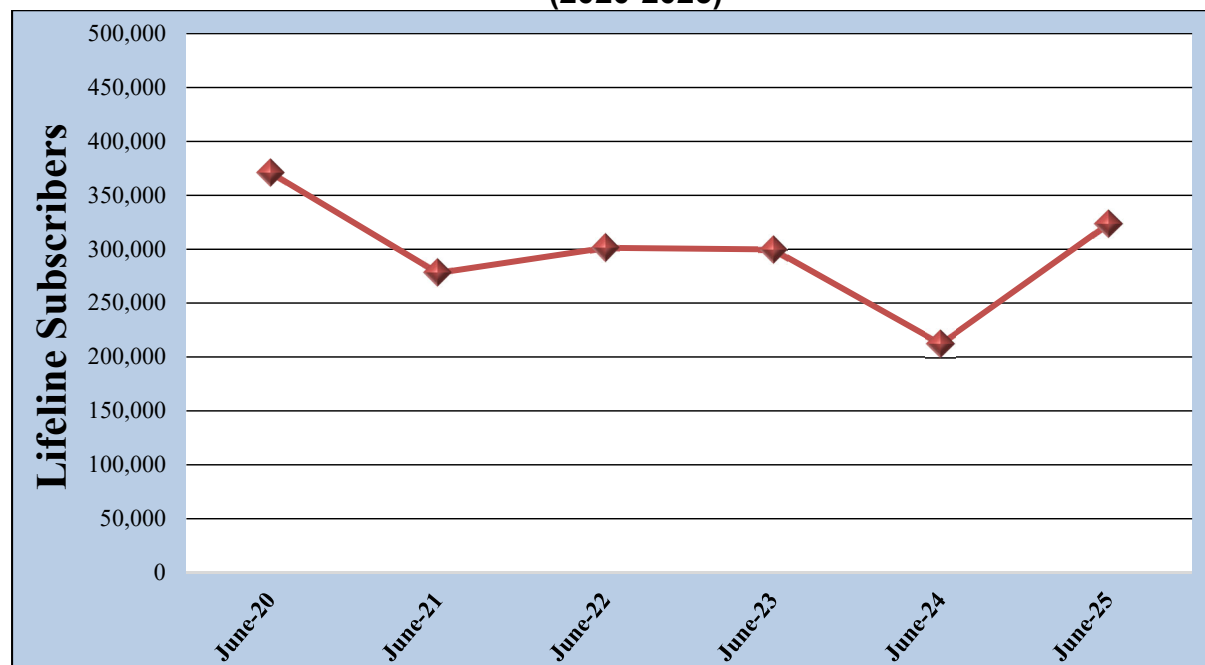
³⁶ 2025 Lifeline Data Request.

IV. Lifeline Participation

A. Participation

As of June 30, 2025, there were 332,887 subscribers enrolled in Lifeline in Florida. During the 2024-2025 reporting period, Lifeline subscribership increased by 120,644, which represents a 57 percent increase from the previous year. Florida had experienced declines in Lifeline participation in 2020, 2021, and 2024, while there was minimal changes in 2022 and 2023. The recent increase in subscribership is likely attributed to the number of wireless companies granted ETC designation in Florida in 2024 and 2025. Figure 2 shows annual Lifeline subscribership for the last six years.

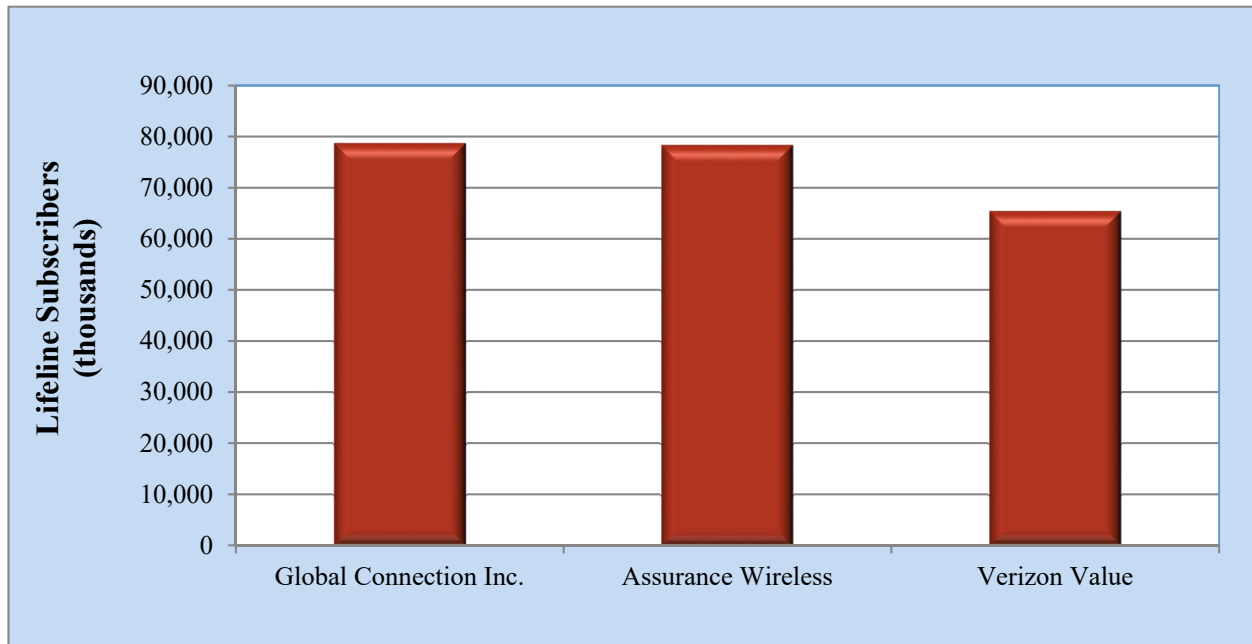
Figure 2
Florida Lifeline Subscribership
(2020-2025)



Source: USAC (Lifeline subscribers adjusted for carrier true-ups)

The three ETCs with the most Lifeline subscribers in Florida for 2025 are identified in Figure 3. For the last twenty years, Assurance Wireless and Verizon Value have been the dominant providers of Lifeline service in Florida. In the 2023-2024 reporting period, they represented more than 97 percent of the Florida Lifeline market. However, in this reporting period their market share went down to 44 percent. Both carriers have experienced significant declines in subscribership since last year. Assurance Wireless lost 33 percent of its Lifeline customers, leaving it with 78,389 customers in Florida. By comparison, Verizon Value lost 27 percent of its Lifeline customers, leaving it with 65,266 customers in Florida. Global Connection Inc. of America, a new wireless ETC, entered the Florida market with the most Lifeline subscribers.

Figure 3
Top Three Florida Lifeline ETCs



Source: Industry Responses to 2025 FPSC Data Requests

Table 5 compares the number of households enrolled in Lifeline with the estimated number of Lifeline eligible households based upon SNAP participation. Using SNAP participation as a proxy for the number of Lifeline eligible households suggests there are significant growth opportunities for Lifeline enrollment. However, it should be noted if a customer's preferred carrier is not an ETC, they may be less likely to participate in the program if it requires switching providers. This is especially true when a customer is required to pay an early contract termination fee to make such a switch.

Table 5
Lifeline Participation Rate in Eligible Florida Households

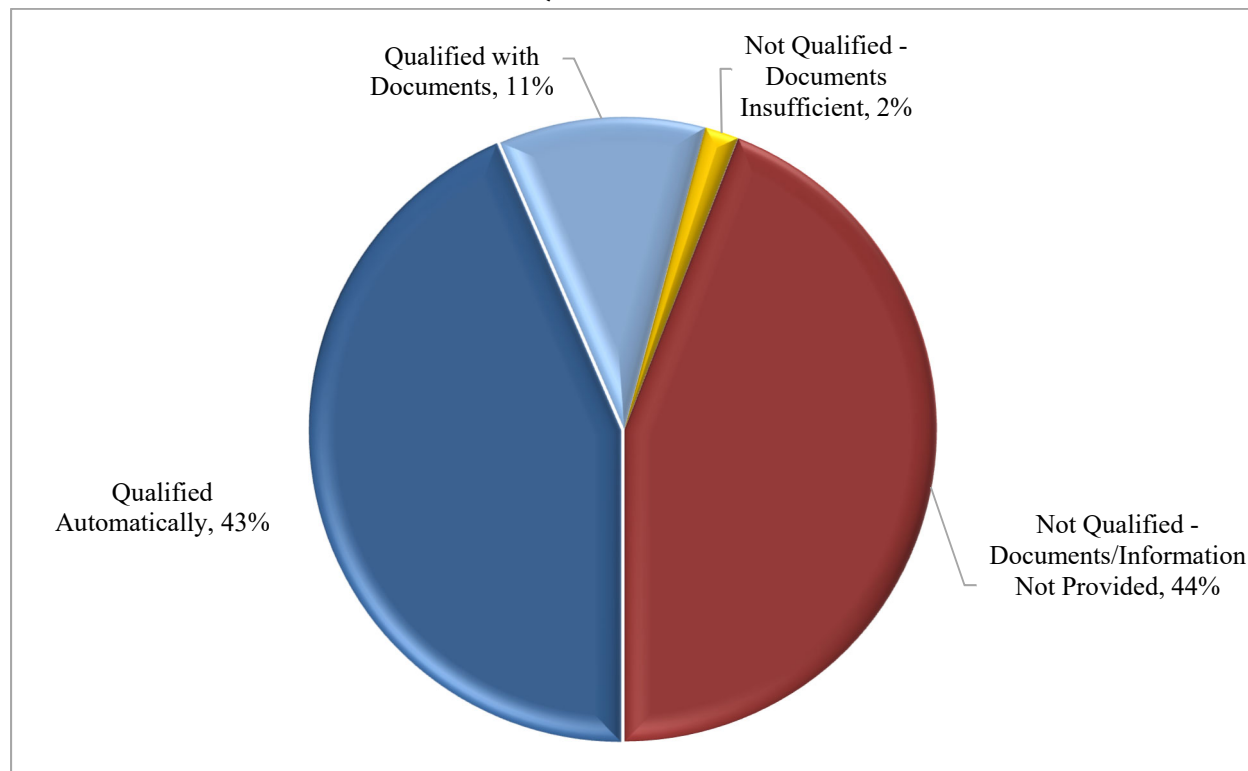
Year	Lifeline Enrollment	Eligible Households	Percent Participation
June 2021	273,641	1,882,842	14.53%
June 2022	300,285	1,590,216	18.88%
June 2023	300,229	1,658,694	18.10%
June 2024	212,244	1,661,381	12.78%
June 2025	332,887	1,672,792	20.27%

Source: Florida DCF, Access Florida: Standard Data Tables

While there was an increase in subscribership during the 2024–2025 reporting period, there was also an increase in Lifeline eligible households of 11,411.³⁷ Even with an increase in the number of eligible households, the participation rate increased by more than 7 percent over the last reporting period.

During the 2024–2025 reporting period, the National Verifier received 1,666,180 applications from Florida.³⁸ Figure 4 illustrates that 54 percent of all applications qualified for Lifeline. Most of these applications, 43 percent, were approved by USAC automatically by verifying consumers eligibility through databases of qualifying programs. In Florida, these databases include those managed by DCF and other federal agencies. Among the 46 percent of applications that were not approved, 44 percent did not provide needed documents or information to support their applications within 45 days.

Figure 4
National Verifier Qualification Results in Florida



Source: USAC Lifeline Program Data (2024-2025 reporting period)

³⁷ Florida DCF, Access Florida: Standard Data Reports by Caseload, <https://www.myflfamilies.com/services/public-assistance/additional-resources-and-services/ess-standard>, accessed on October 10, 2025.

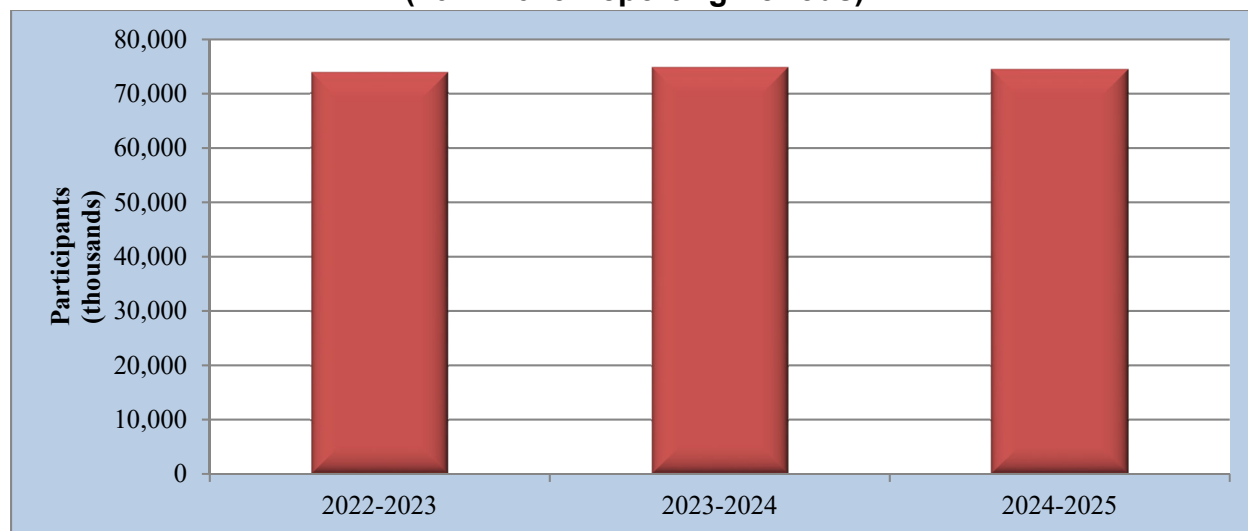
³⁸ USAC, Program Data, <https://www.usac.org/lifeline/resources/program-data/>, accessed on October 15, 2025.

B. Transitional Lifeline

Transitioning from the Lifeline program usually occurs when a customer's socio-economic status has improved, thus advancing them beyond the qualifying eligibility criteria. As required by Section 364.105, F.S., customers who no longer qualify for Lifeline are eligible to receive a 30 percent discount on the residential basic local service rate for one year. For example, a former Lifeline customer with a \$25 phone bill would receive a \$7.50 monthly discount for one year.

Figure 5 represents the average monthly number of Transitional Lifeline customers of Florida ETCs. During the reporting period, the average number of monthly customers receiving the Transitional Lifeline benefit was 74,385, which represents a slight decrease over the previous period.

Figure 5
Average Monthly Transitional Lifeline Participants
(2022-2025 Reporting Periods)



Source: Industry Responses to FPSC Data Requests (2022-2025)

Rather than offer a transitional discount, to comply with Section 364.105, F.S., Verizon Value offers its former Lifeline customers a 30 percent discount on the customer's chosen prepaid wireless service rates for at least one-year after termination of their Lifeline benefits. Verizon Value does not track Transitional Lifeline customers participating in this manner and, therefore, is not included in Figure 5.

Appendix A

2025 U.S. Poverty Guidelines

Persons in Family/Household	2025 U.S. Federal Poverty Guidelines	135% of Federal Poverty Guidelines	Monthly Income at 135% of Federal
1	15,650.00	21,127.50	1,760.63
2	21,150.00	28,552.50	2,379.38
3	26,650.00	35,977.50	2,998.13
4	32,150.00	43,402.50	3,616.88
5	37,650.00	50,827.50	4,235.63
6	43,150.00	58,252.50	4,854.38
7	48,650.00	65,677.50	5,473.13
8	54,150.00	73,102.50	6,091.88

Source: Department of Health and Human Services, Annual Update of the Department of Health and Human Service Poverty Guidelines. Federal Register Notice, released January 17, 2025, <https://www.federalregister.gov/documents/2025/01/17/2025-01377/annual-update-of-the-hhs-poverty-guidelines>, accessed on October 15, 2025.

Appendix B

Agency, Organization, and Business Lifeline Partners

FLORIDA LIFELINE PARTNERS	
1000 Friends of Florida, Inc.	Center for Hearing and Communication
A Caring Hand Home Care	Centers for Drug Free Living
AARP–Florida Chapter	Centers for Independent Living
Ability Housing of Northeast Florida	Central Florida Community Action Agency
ACCESS Florida Community Network Partners	City and County Consumer Assistance Departments
Advance Senior Solutions, Inc.	City and County Consumer Assistance Departments
Agency for Health Care Administration	City and County Housing Authorities
Agency for Persons with Disabilities	City and County Social Programs
Aging and Disability Resource Center of Broward County	Coalition of Florida Farmworker Organizations, Inc.
Aging Matters in Brevard County	Communities In Schools Foster Grandparent Program
Aging True Community Senior Services	Florida Lifeline Partners
Aging With Dignity	Community Action Program Committee, Inc.
Aging Solutions, Inc.	Community Legal Services
Alliance for Aging, Inc.	Communities In Schools Foster Grandparent Program
America's Second Harvest of the Big Bend, Inc.	Community Legal Services
Area Agencies on Aging	Community Partnership Group
ASPIRE Health Partners	Corporation to Develop Communities of Tampa, Inc.
Big Bend 2-1-1 and other 2-1-1 Agencies	Deaf and Hard of Hearing Services of Florida, Inc.
Boley Centers, Inc.	Deaf & Hard of Hearing Services of NW Florida, Inc.
Braille and Talking Book Library	Disability Rights Florida
Brain Injury Association of Florida, Inc.	Elder Options
Bridges at Riviera Beach	Elder Source
Bridgeway Center, Inc.	Faith Radio Station and other Florida radio stations
Broward County Elderly & Veterans Services Division	Federal Social Security Admin - Tallahassee District
Bureau of Indian Affairs Programs	Feeding South Florida
Capital Area Community Action Agency, Inc.	First Quality Home Care
CARES of Florida	Florida Alliance for Information and Referral Services
Carrfour Supportive Housing	Florida Assisted Living Association
Catholic Charities of Central Florida	Florida Association for Community Action

FLORIDA LIFELINE PARTNERS (continued)	
Florida Association of Community Health Centers	Gateway Community Outreach
Florida Association of Counties	Good News Outreach
Florida Association of County Human Service Admin	Goodwill Industries of Central Florida
Florida Association of the Deaf, Inc.	Habitat for Humanity – Florida
Florida Association of Food Banks	HANDS of Central Florida
Florida Association of Housing and Redevelopment Officials	Harry Chapin Food Bank of Southwest Florida
Florida Coalition for Children	Hemophilia Foundation of Greater Florida
Florida Coalition for the Homeless	Hillsborough County Community Action Program
Florida Council on Aging	Hispanic Office for Local Assistance
Florida Deaf Services Centers Association	HOPE Community Center
Florida Department of Business and Professional Regulation	HOPE Connection
Florida Department of Children and Families	HOPE Partnership
Florida Department of Economic Opportunity	League for the Hard of Hearing
Florida Department of Education	Leon County School Board
Florida Department of Elder Affairs	Little Havana Activities and Nutrition Centers
Florida Department of Revenue	Living Stones Native Circle
Florida Department of Veterans' Affairs	Marion Senior Services
Florida Elder Care Services	Miccosukee Tribe of Indians of Florida
Florida Highway Safety and Motor Vehicles	Mid-Florida Housing Partnership, Inc.
Florida Hospital Association	Monroe County Community Support Services
Florida Housing Authorities	National Church Residences
Florida Housing Coalition	Monroe County Social Services
Florida Housing Finance Corporation	NAACP (Florida Associations)
Florida League of Cities, Inc.	North Miami Foundation for Senior Citizens' Services, Inc.
Florida Low Income Housing Associates	Nursing Homes Administrators
Florida Nurses Association	Nu-Hope of Highlands County
Florida Office of Public Counsel	One-Stop Career Centers
Florida Ombudsman Program	Osceola County Corrections Department
Florida Public Libraries	Palm Beach Community Action Agency
Florida Public School Districts	Refuge House of the Big Bend
Florida Rural Legal Services, Inc.	Second Harvest Food Bank of Central Florida
Florida Schools for the Deaf and Blind	Second Harvest of the Big Bend
Florida Senior Medicare Patrol	Seminole County Community Development
Florida Senior Program	Senior Connection Center, Inc.
Florida Telecommunications Relay, Inc.	Senior Friendship Centers
Florida Voters League	Senior Medicare Patrol

FLORIDA LIFELINE PARTNERS (continued)	
Senior Resource Alliance	U.S. Department of Housing and Urban Development
Senior Solutions	United Home Care Services
Seniors First	United Way of Florida
SHINE Program	United Against Poverty
South East American Council, Inc.	Urban Jacksonville
Suwannee River Economic Council	Urban Leagues of Florida
Tallahassee Memorial Hospital	Volusia County Community Services
Tallahassee Urban League	Wakulla County Senior Citizens Council
Tampa Vet Center	Walton County Council on Aging
The Shepherd's Center of Orange Park	Washington County Council on Aging
Three Rivers Legal Services, Inc.	We Care-Jacksonville
Treasure Coast Food Bank	

Appendix C

Wireless ETCs and Networks Used

ETC	Network(s) Used
Air Voice Wireless	AT&T
American Broadband and Telecom.	T-Mobile
Amerimex Comm.	AT&T and T-Mobile
Assurance Wireless*	T-Mobile
Boomerang Wireless	T-Mobile
DISH Wireless*	DISH/EchoStar, AT&T, and T-Mobile
Florida Terracom	T-Mobile and AT&T
Global Connection	T-Mobile
IM Telecom	AT&T, Verizon, and T-Mobile
i-Wireless	T-Mobile
Mediacom	Verizon
TAG Mobility	AT&T
Telrite Corp.	AT&T
Tempo Telecom	T-Mobile
TruConnect Comm.	T-Mobile and Verizon
Verizon Value f/k/a TracFone	Verizon

*Assurance Wireless, Verizon Value, and DISH Wireless each use their own network.

Appendix D

Lifeline Enrollment and Year-to-Year Net Growth Rate

	ETC (Parent)	June 2023	June 2024	Net Growth Rate 2024	June 2025	Net Growth Rate 2025
Wireless	Air Voice Wireless	N/A	N/A	N/A	53,699	100%
	American Broadband & Telecom.	N/A	N/A	N/A	3,746	100%
	Amerimex Comm.	N/A	N/A	N/A	733	100%
	Assurance Wireless (T Mobile)	169,309	116,807	-31%	78,349	-33%
	Boomerang Wireless	N/A	N/A	N/A	0	0%
	DISH Wireless	N/A	N/A	N/A	25,140	100%
	Florida Terracom	N/A	N/A	N/A	0*	0%
	Global Connection (Odin Mobile)	N/A	N/A	N/A	78,682	100%
	IM Telecom	N/A	N/A	N/A	0*	100%
	i-Wireless	2,271	2,705	19%	2,232	-17%
	Mediacom	0*	0*	0%	0	0%
	TAG Mobility	N/A	N/A	N/A	9,158	100%
	Telrite Corp.	N/A	N/A	N/A	5,393	100%
	Tempo Telecom	N/A	N/A	N/A	0*	0%
	TruConnect Comm.	N/A	N/A	N/A	8,013	100%
	Verizon Value f/k/a TracFone	123,926	89,548	-28%	65,266	-27%

Source: FPSC Data Requests

*Did not offer Lifeline

N/A (Not Applicable) used if the company was not an ETC during the reporting period.

Brand names used by wireless ETCs can be located in Chapter III.

Lifeline Enrollment and Year-to-Year Net Growth Rate (continued)

	ETC (Parent)	June 2023	June 2024	Net Growth Rate 2024	June 2025	Net Growth Rate 2025
Wireline	Bright House Networks Information Services / Spectrum (Charter)	0	0	0%	1	100%
	CenturyLink / Quantum Fiber (Lumen)	1,844	1,259	-32%	822	-35%
	Conexon Connect	0*	18	100%	65	261%
	Consolidated Comm.	163	121	-26%	69	-43%
	Frontier Florida	1,102	592	-46%	751	27%
	Frontier of the South	32	18	-44%	9	-50%
	Integrated Path Comm.	N/A	N/A	N/A	0	0%
	ITS Fiber / Blue Stream Fiber	54	37	-31%	17	-54%
	Knology / WOW!	43	71	65%	79	11%
	NEFCOM	131	109	-17%	85	-22%
	Phone Club	138	95	-31%	48	-49%
	Quincy Telephone / TDS Telecom	68	51	-25%	33	-35%
	Smart City	6	2	-67%	2	0%
	Windstream / Kenetic	1,142	810	-29%	494	-39%
Satellite	Viasat	0	0	0%	1	100%
	Total	300,299	212,243	-29%	332,887	57%

Source: FPSC Lifeline Data Request

*Did not offer Lifeline

N/A (Not Applicable) used if the company was not an ETC during the reporting period.

Appendix E

Lifeline Subscription by Service Type (June 2025)

	ETC (Parent)	Voice	Broadband	Bundled
Wireless	Air Voice Wireless	0%	0%	100%
	American Broadband & Telecom.	0%	0%	100%
	Amerimex Comm.	0%	0%	100%
	Assurance Wireless (T-Mobile)	0%	0%	100%
	Boomerang Wireless	0%	0%	0%
	DISH Wireless	0%	0%	100%
	Florida Terracom*	0%	0%	0%
	Global Connection (Odin Mobile)	0%	0%	100%
	IM Telecom*	0%	0%	0%
	i-Wireless	0%	0%	100%
	Mediacom	0%	0%	0%
	TAG Mobility	0%	0%	100%
	Telrite Corp.	0%	0%	100%
	Tempo Telecom*	0%	0%	0%
	TruConnect	0%	0%	100%
	Verizon Value f.k/a TracFone	0%	0%	100%

Source: FPSC Lifeline Data Request

*Not currently offering Lifeline

Brand names used by wireless ETCs can be located in Chapter III.

Lifeline Subscription by Service Type (continued)

	ETC (Parent)	Voice	Broadband	Bundled
Wireline	Bright House Networks Information Services / Spectrum (Charter)	0%	100%	0%
	CenturyLink / Quantum Fiber (Lumen)	68.98%	23.60%	7.42%
	Conexon Connect	0%	87.69%	12.31%
	Consolidated Comm.	63.77%	10.14%	26.09%
	Frontier Florida	24.63%	62.32%	13.05%
	Frontier of the South	55.56%	33.33%	11.11%
	Integrated Path Comm.	0%	0%	0%
	ITS Fiber / Blue Stream Fiber	0%	82.35%	17.65%
	Knology / WOW!	0%	86.08%	13.92%
	NEFCOM	24.71%	4.71%	70.59%
	Phone Club	100%	0%	0%
	Quincy Telephone / TDS Telecom	18.18%	3.03%	78.79%
	Smart City	0%	100%	0%
	Windstream / Kenetic	9.51%	20.85%	69.64%
Satellite	Viasat	0%	100%	0%
	Total	0.27%	0.27%	99.46%

Source: FPSC Lifeline Data Request

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

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

DATE: October 28, 2025

TO: Braulio L. Baez, Executive Director

FROM: Office of Industry Development & Market Analysis (Long) ^{CH}

RE: Draft of the 2025 Regulatory Assessment Fee Report

CRITICAL INFORMATION: ACTION IS NEEDED - Please place on the November 4, 2025 Internal Affairs. Commission approval of draft report is sought. The 2025 Report is due to the Governor, the President of the Senate, and the Speaker of the House of Representatives, by January 15, 2026.

Pursuant to Section 364.336(3), Florida Statutes, "(b)y January 15, 2012, and annually thereafter, the commission must report to the Governor, the President of the Senate, and the Speaker of the House of Representatives, providing a detailed description of its efforts to reduce the regulatory assessment fee for telecommunications companies, including a detailed description of the regulatory activities that are no longer required; the commensurate reduction in costs associated with this reduction in regulation; the regulatory activities that continue to be required under this chapter; and the costs associated with those regulatory activities."

The draft report includes a staff-written synopsis of what actions the Commission has taken to comply with the statutory requirements. Staff is requesting approval of the draft report.

Attachment

cc: Mark Futrell, Deputy Executive Director, Technical
Apryl Lynn, Deputy Executive Director, Administrative

DRAFT

**REPORT ON THE EFFORTS OF THE
FLORIDA PUBLIC SERVICE COMMISSION
TO REDUCE THE REGULATORY ASSESSMENT FEE
FOR TELECOMMUNICATIONS COMPANIES**



As of December 2025

**REPORT ON THE EFFORTS OF THE
FLORIDA PUBLIC SERVICE COMMISSION
TO REDUCE THE REGULATORY ASSESSMENT FEE
FOR TELECOMMUNICATIONS COMPANIES**



As of December 2025

Office of Industry Development and Market Analysis

Introduction

During the 2011 Legislative Session, House Bill CS/CS/HB 1231, the “Regulatory Reform Act” (Act), was passed and signed into law by the Governor, effective July 1, 2011. Under the Act, the Legislature eliminated most of the Florida Public Service Commission’s (FPSC’s or Commission’s) retail oversight authority for the telecommunications wireline companies, yet maintained the FPSC’s authority over wholesale intercarrier issues. The FPSC was required to reduce its regulatory assessment fees (RAFs) charged to wireline telecommunications companies to reflect the concurrent reduction in FPSC workload. Section 364.336(3), Florida Statutes, requires:

By January 15, 2012, and annually thereafter, the commission must report to the Governor, the President of the Senate, and the Speaker of the House of Representatives, providing a detailed description of its efforts to reduce the regulatory assessment fee for telecommunications companies, including a detailed description of the regulatory activities that are no longer required; the commensurate reduction in costs associated with this reduction in regulation; the regulatory activities that continue to be required under this chapter; and the costs associated with those regulatory activities.

As a result of this Act, the FPSC reduced its RAF rates 20%, from 0.0020 to 0.0016 of companies’ gross operating revenues derived from intrastate business. This change became retroactively effective July 1, 2011. Florida telecommunications statutes have remained essentially unchanged since 2011. The FPSC has introduced numerous measures to streamline its telecommunications-related activities since that time, and continues to look for ways to streamline its remaining responsibilities.

Regulatory Activities That Are No Longer Required

The Act eliminated most of the retail regulation of local exchange telecommunications services by the FPSC, including the elimination of rate caps on all retail telecommunications services, elimination of telecommunications-related consumer protection and assistance duties of the FPSC, and elimination of the FPSC’s remaining oversight of telecommunications service quality. The Act also reformed the FPSC’s certification processes, authority over intercarrier matters, and other general revisions.

Consistent with the reduced authority of the FPSC from the Act, the FPSC ceased the following activities:

- Resolving non-basic retail consumer billing complaints.
- Addressing slamming or cramming complaints from consumers. The FPSC continues to address slamming complaints that are reported by carriers under the Commission’s wholesale authority.

- Publishing and distributing materials informing consumers on billing-related matters or informative materials relating to the competitive telecommunications market.
- Designating wireless eligible telecommunications carriers (ETCs) in Florida for the federal universal service fund. Any wireless carrier seeking ETC status in Florida would now have to petition the Federal Communications Commission (FCC) for that authority.
- Performing service evaluations on carriers or investigating and resolving service-related consumer complaints, except as they may relate to Lifeline service, Telephone Relay Service, and payphones.
- Allowing incumbent local exchange carriers (ILECs) to petition for recovery of storm-damage-related costs and expenses.
- Reviewing non-access service tariff filings for content, form, or format. It is the carrier's choice whether to file its rate schedules with the FPSC or publicly publish the schedules elsewhere, such as the companies' websites.

Regulatory Activities That Continue To Be Required

The FPSC regulates 283 telecommunications companies in some way as of October 13, 2025. Following the Act, the Commission retained authority and responsibility in the following areas for telecommunications companies:

- Resolving intercarrier disputes involving interpretations and implementation of sections of the intercarrier agreements.
- Processing arbitrations of intercarrier agreements when the companies cannot negotiate all the terms of the agreement and request the FPSC to resolve issues the companies define.
- Reviewing interconnection agreements filed with the FPSC in accordance with federal requirements.
- Resolving cases involving area code relief, number conservation plans, number resource reclamation, local number portability, and other numbering issues.
- Analyzing information for and producing several statutorily required reports: the *Annual Report on the Status of the Telecommunications Access System Act of 1991*, the *Annual Report on Lifeline Assistance*, the *Report on the Status of Competition in the Telecommunications Industry*, and the following *Report on the Efforts of the Florida Public Service Commission to Reduce the Regulatory Assessment Fee for Telecommunications Companies*.

- Maintaining oversight of the Florida Telecommunications Relay Service.
- Maintaining oversight of the Lifeline Program and monitoring ETCs.
- Issuing certificates of authority for telecommunications companies to operate in Florida, including evaluating the applicant's technical, financial, and managerial capability to provide service.
- Resolving consumer complaints relating to Lifeline, Relay Service, and payphones.
- Publishing network access tariff information for all incumbent local carriers.
- Publishing other tariff/rate schedule information for any certificated company if the company so decides.
- Publishing and distributing informative materials relating to the Lifeline Program and conducting related consumer outreach.
- Monitoring and/or participating in federal proceedings where the state's consumers may be affected and conveying the FPSC's policy positions.

New Regulatory Activities

During the 2021 Legislative Session, Senate Bill CS/SB 1944 was passed and signed into law by the Governor, effective July 1, 2021. The bill created Section 366.94(8), F.S., requiring the FPSC to regulate and enforce rates, charges, terms, and conditions for pole attachments, which were regulated by the FCC at the time. Section 366.02(7), F.S., defines "pole attachment" as "any attachment by a public utility, local exchange carrier, communications services provider, broadband provider, or cable television operator to a pole, duct, conduit, or right-of-way owned or controlled by a pole owner." Pursuant to Section 366.94(8)(e), F.S., the Commission shall hear and resolve complaints concerning rates, charges, terms, conditions, voluntary agreements, or any denial of access relative to pole attachments. Such complaints will likely involve local exchange carriers and other communications services providers. The Commission adopted procedural rules to implement this new authority on June 8, 2022. The Commission subsequently certified to the FCC pursuant to 47 U.S.C. § 224(c)(2) that the Commission now regulates the rates, terms, and conditions of pole attachments in Florida.

Senate Bill CS/SB 1944 also created Section 366.94(9), F.S., requiring the FPSC to regulate the safety, vegetation management, repair, replacement, maintenance, relocation, emergency response, and storm restoration requirements for certain poles owned by communications services providers. The Commission adopted rules to implement this new authority on May 1,

2022. Sections 366.94(8) and (9), F.S., represent an expansion of the FPSC's regulation of telecommunications companies in Florida.

During the 2024 Legislative Session, Senate Bill CS/SB 478 was passed and signed into law by the Governor, effective April 15, 2024. The bill amended Section 364.10, F.S., expanding the FPSC's jurisdiction specifically to grant ETC designation to wireless carriers for the purpose of providing Lifeline service.

Savings

The FPSC has been pursuing cost savings and efforts to streamline regulatory processes for well over a decade. The origin of these streamlining efforts is not limited to the emergence and evolution of competition in the telecommunications industry. In fiscal year 1999/2000, the FPSC had 401 full time positions. That number was reduced over the years, leading to a total of 268 full time positions for the 2025/2026 fiscal year, a total reduction of 33 percent. Many of these reductions came as a result of projected workload reductions in the telecommunications area.

As previously discussed, effective July 2011, the FPSC reduced the telecommunications RAF rate from 0.0020 to 0.0016 of the gross operating revenues derived from intrastate business. In addition, all local telephone service providers now pay \$600 as the minimum fee instead of varying rates based upon the service offered.¹ At the current 0.0016 rate, carriers will pay this minimum fee up to \$375,000 in gross intrastate operating revenues. The reduced RAF rate was determined assuming reduced responsibilities, projecting staff hours on continuing telecommunications workload, and projecting telecommunications company revenues. As they have for several years, revenues subject to RAFs from telecommunications companies regulated by the FPSC continued to decline in 2025 as traditional wireline revenues are replaced by unregulated (VoIP/broadband) services.

Efforts to Reduce Costs

As previously stated, the FPSC has a long history of seeking cost savings and streamlining regulatory processes. With specific regard to the implementation of the Act, the FPSC initially undertook three new processes. First was the RAF rate reduction previously discussed. Second, the FPSC assessed the number of staff equivalents required to perform the duties associated with the deregulation measures in the Act. Based upon time sheet information, twelve positions were eliminated effective July 1, 2011. These positions reflected the elimination of service requirements, processing of most telecommunications customer complaints, long distance carrier activities, a reduction in price schedule maintenance, and a reduction in consumer information and outreach.

¹ Previously, the minimum fee ranged from \$600 to \$1,000, depending on the type of service offered. Payphone operators continue to pay a minimum fee of \$100.

Third, the FPSC retained the National Regulatory Research Institute (NRRI) in May 2011, to review the FPSC's organization structure and work flow processes to determine if the FPSC should implement any additional changes in the telecommunications area. NRRI reviewed the agency operating procedures, organizational charts, and workload. Key telecommunications staff were interviewed and most telecommunications direct staff were given a survey to complete. NRRI studied the Act and the resulting changes to the FPSC's responsibility. The telecommunications-direct staff of the FPSC was then compared to that of other states with respect to statutory authority and number of technical staff assigned. NRRI concluded that the structure of the FPSC's telecommunications group was appropriate and compared favorably to those in other states.

NRRI found that the size of the telecommunications group was correct, but made a few suggestions where the FPSC could add more streamlining or cost reduction measures. The FPSC implemented NRRI's recommendations, including:

- The FPSC further shifted responsibilities to the administrative staff for the competition report's document control and relay data collection functions.
- The FPSC simplified the review process, analysis of data, and reduced the length of the competition report.
- The FPSC encouraged and trained companies to submit tariffs and service schedules online.

In subsequent years, the FPSC has implemented many additional efficiency measures. In 2011, the FPSC had 115 telecommunications-related rules. Through consolidation, revision, and elimination, there are now 22 active telecommunications-related rules.

In 2013, the FPSC implemented agency-wide electronic filing and submission policies that will substantially reduce the number of paper documents at the agency. Coincidentally with the agency-wide policy, the telecommunications group began updating its online tariff filing procedures and converting its existing tariff documents to digital format. All official copies of telecommunications tariffs, price lists, and service schedules are now available on the agency's website, as are all tariff updates. This development allows greater access to both consumers and companies, and reduces costs associated with record requests. Additionally, the FPSC continues the process of eliminating all obsolete or redundant paper archives of companies' rates and schedules.

Additionally, the telecommunications staff has become very flexible and able to perform a wide variety of functions. It has conducted periodic internal cross training on its remaining responsibilities, through both scheduled office-wide training sessions and temporary transfers of job duties. It has also developed comprehensive written Standard Operating Procedures for its functions. As staff become familiar with each other's duties, the requisite training time will be reduced should the need arise to further consolidate or transfer functions.

During 2012, the technical staff responsible for continuing statutory mandates were consolidated and established as a stand-alone unit within the agency to maximize efficiency and minimize supervisory needs. Then, in 2017, as further efficiency measures and staff changes were implemented, the FPSC merged its telecommunications staff with another office to streamline its processes further. Some administrative and management functions were consolidated, creating more savings for the agency. Other efficiency-related activity has included the transfer of call testing for Relay Service from FPSC staff to the relay provider, streamlined telecommunications certification and certificate transfer processes, and further transfers of duties to administrative staff.

In fulfilling its remaining telecommunications regulatory responsibilities, the Commission continually seeks to increase efficiency and cost savings. For example, the Lifeline Promotion Process connects customers who apply for assistance programs with the Florida Department of Children and Families (DCF), which make the customer eligible for Lifeline, with Eligible Telecommunications Carriers (ETCs) that can provide the Lifeline discount. When that process does not result in a connection, FPSC staff sends the customer instructions on how to apply for Lifeline using the National Verifier. Between January and November 2025, the FPSC sent 14,113 such letters to eligible households. In comparison, during the same period in 2024, the FPSC mailed 53,807 letters, with a total of 59,353 sent throughout last year. This significant decrease is attributed to FPSC staff working with ETCs to assume more responsibility for sending letters to prospective customers, and working with DCF to update its list of companies offering Lifeline for applicants to select. These changes are estimated to have saved the agency approximately \$30 thousand in 2025.

Summary

The FPSC has proactively responded to the changes in its statutory authority as a result of the Act. The agency has assessed the appropriate staffing levels for the telecommunications staff, and will continue to monitor the workload and staffing needs. The FPSC hired NRRI in 2011 to audit the FPSC's telecommunications program to determine if additional changes needed to be made. The audit results reflected favorably upon the program, and the FPSC has implemented NRRI's suggestions. The FPSC has reviewed its telecommunications rules and eliminated unnecessary or obsolete regulations. The agency continues to seek ways to economize its resources while maintaining a high quality work product for all industries under the FPSC's authority, including telecommunications.

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

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

DATE: October 22, 2025

TO: Braulio L. Baez, Executive Director

FROM: Greg Davis, Engineering Specialist III, Division of Engineering
Phillip O. Ellis, Public Utilities Supervisor, Division of Engineering

GD TB
POE LK

RE: Draft Review of the 2025 Ten-Year Site Plans of Florida's Electric Utilities

CRITICAL INFORMATION: Place on November 4, 2025 Internal Affairs Agenda. Approval by the Commission is required by December 31, 2025.

Pursuant to Section 186.801, Florida Statutes, electric utilities are required to submit to the Commission a Ten-Year Site Plan which shall estimate a utility's power-generating needs and the general location of its proposed power plant sites. The Commission is required to make a preliminary study of each plan and classify it as "suitable" or "unsuitable" within nine months after receipt of the proposed plan. Electric utility plans were filed on April 1, 2025. Staff seeks approval of the attached draft report that includes a statewide assessment, and an analysis and recommended classification of each plan.

Please contact me or Phillip Ellis if you have any questions or need additional information in reference to the attached document.

GD:pz

Attachment

cc: Adria Harper, General Counsel
Mark Futrell, Deputy Executive Director – Technical
Apryl Lynn, Deputy Executive Director – Administrative

REVIEW OF THE
2025 TEN YEAR SITE PLANS
OF FLORIDA'S ELECTRIC UTILITIES

DRAFT 10-22-2025



**FLORIDA PUBLIC
SERVICE COMMISSION**

DECEMBER 2025

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List of TYSP Utilities

Name	Abbreviation
Investor-Owned Electric Utilities	
Florida Power & Light Company	FPL
Duke Energy Florida, LLC	DEF
Tampa Electric Company	TECO
Municipal Electric Utilities	
Florida Municipal Power Agency	FMPA
Gainesville Regional Utilities	GRU
JEA	JEA
Lakeland Electric	LAK
Orlando Utilities Commission	OUC
City of Tallahassee Utilities	TAL
Rural Electric Cooperatives	
Seminole Electric Cooperative	SEC

Unit Type, Fuel, and Other Abbreviations

Reference	Name	Abbreviation
Unit Type	Battery Storage	BAT
	Combined Cycle	CC
	Combustion Turbine	CT
	Hydroelectric	HY
	Internal Combustion	IC
	Photovoltaic	PV
	Steam Turbine	ST
Fuel Type	Bituminous Coal	BIT
	Distillate Fuel Oil	DFO
	Landfill Gas	LFG
	Natural Gas	NG
	Nuclear	NUC
Other	Ten Year Site Plan	TYSP

Executive Summary

Integrated resource planning (IRP) is a utility process that includes a cost-effective combination of demand-side resources and supply-side resources. While each utility has slightly different approaches to IRP, some things are consistent across the industry. Each utility must update its load forecast assumptions based on Florida Public Service Commission (Commission) decisions in various dockets, such as demand-side management goals. Changes in government mandates, such as appliance efficiency standards, building codes, and environmental requirements must also be considered. Other updates involve input assumptions like demographics, financial parameters, generating unit operating characteristics, and fuel costs which are more fluid and do not require prior approval by the Commission. Each utility then conducts a reliability analysis to determine when resources may be needed to meet expected load. Next, an initial screening of demand-side and supply-side resources is performed to find candidates that meet the expected resource need. The demand-side and supply-side resources are combined in various scenarios to decide which combination meets the need most cost-effectively. After the completion of all these components, utility management reviews the results of the varying analyses and the utility's TYSP is produced as the culmination of the IRP process. Commission Rules also require the utilities to provide aggregate data which provides an overview of the State of Florida electric grid.

The Commission's annual review of utility TYSPs is non-binding in accordance with Section 186.801(2), Florida Statutes (F.S.), but it does provide state, regional, and local agencies advance notice of proposed power plants and transmission facilities. Any concerns identified during the review of the utilities' TYSPs may be addressed by the Commission at a formal public hearing, such as a power plant need determination proceeding. While Florida Statutes and Commission Rules do not specifically define IRP, they do provide a solid framework for flexible, cost-effective utility resource planning. In this way, the Commission fulfills its oversight and regulatory responsibilities while leaving day-to-day planning and operations to utility management.

Pursuant to Section 186.801, F.S., each generating electric utility must submit to the Commission a TYSP which estimates the utility's power generating needs and the general locations of its proposed power plant sites over a 10-year planning horizon. The TYSPs of Florida's electric utilities summarize the results of each utility's IRP process and identifies proposed power plants and transmission facilities. The Commission is required to perform a preliminary study of each plan and classify each one as either "suitable" or "unsuitable." This document represents the review of the 2025 TYSPs for Florida's electric utilities, as filed by 10 reporting utilities.¹

All findings of the Commission are made available to the Florida Department of Environmental Protection for its consideration at any subsequent certification proceeding pursuant to the Florida

¹ Investor-owned utilities filing 2025 TYSPs include Florida Power & Light Company, Duke Energy Florida, LLC, and Tampa Electric Company. Municipal utilities filing 2025 TYSPs include Florida Municipal Power Agency, Gainesville Regional Utilities, JEA (formerly Jacksonville Electric Authority), Lakeland Electric, Orlando Utilities Commission, and City of Tallahassee Utilities. Seminole Electric Cooperative also filed a 2025 TYSP.

Electrical Power Plant Siting Act or the Florida Electric Transmission Line Siting Act.² In addition, this document is sent to the Florida Department of Agriculture and Consumer Services pursuant to Section 377.703(2)(e), F.S., which requires the Commission provide a report on electricity and natural gas forecasts.

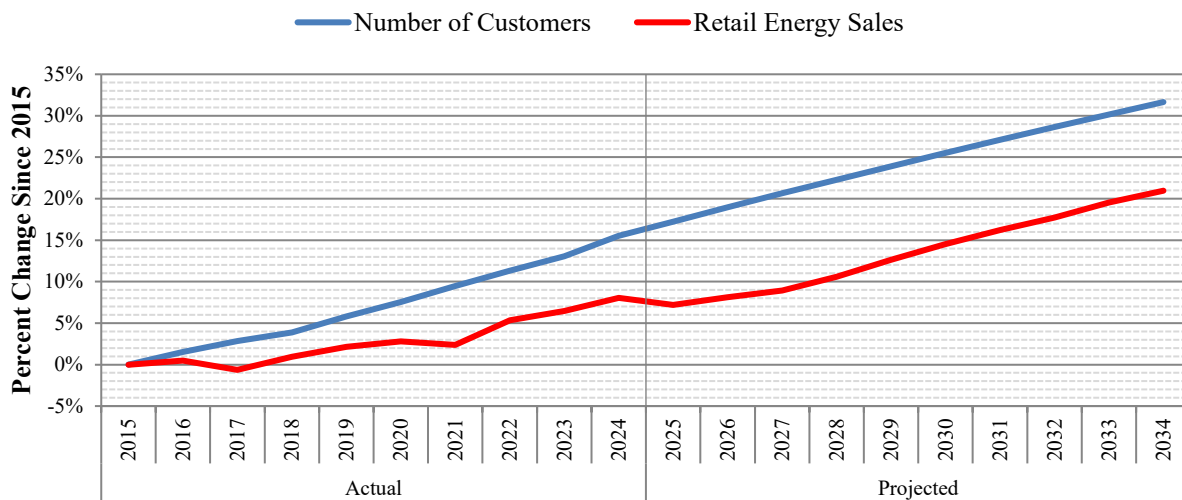
Review of the 2025 TYSPs

The Commission has divided this review into two portions: (1) a Statewide Perspective, which covers the whole of Florida; and (2) Utility Perspectives, which address each of the reporting utilities. From a statewide perspective, the Commission has reviewed the implications of the combined trends of Florida’s electric utilities regarding load forecasting, renewable generation, and traditional generation.

Load Forecasting

Forecasting customer energy needs or load is a fundamental component of electric utility planning. In order to maintain an adequate and reliable system, utilities must project and prepare for changes in overall electricity consumption patterns. These patterns are affected by the number and type of customers, and factors that impact customer usage including weather, economic conditions, housing size, building codes, appliance efficiency standards, new technologies, and demand-side management. Florida’s utilities use well-known and tested forecasting methodologies, which are consistent with industrywide practices used in generation planning. Figure 1 provides the historical and forecasted trends in customer growth and energy sales. Normalized weather trends were used to forecast 2025 through 2034, which start slightly below the actual 2024 level but increase annually at 1.35 percent.

Figure 1: State of Florida - Growth in Customers and Sales



Source: Florida Reliability Coordinating Council (FRCC) 2025 Regional Load and Resource Plan

² The Florida Electrical Power Plant Siting Act is Sections 403.501 through 403.518, F.S. Pursuant to Section 403.519, F.S., and the Commission is the exclusive forum for the determination of need for an electrical power plant. The Florida Electric Transmission Line Siting Act is Sections 403.52 through 403.5365, F.S. Pursuant to Section 403.537, F.S., and the Commission is the sole forum for the determination of need for a transmission line.

Renewable Generation

Renewable resources continue to expand in Florida, with approximately 14,723 megawatts (MW) of renewable generating capacity currently in Florida. The majority of installed renewable capacity is represented by solar photovoltaic (PV) generation which makes up approximately 90 percent of Florida's existing renewables. Notably, Florida electric customers had installed 2,801 MW of demand-side renewable capacity by the end of 2024, an increase of 19 percent from 2023.

Florida's total renewable resources are expected to increase by approximately 26,228 MW over the 10-year planning period, excluding any potential demand-side renewable energy additions. Solar PV accounts for all of this increase. Table 1 provides a breakdown of each TYSP Utility's actual 2024 and projected 2034 generation from renewables, in gigawatt-hours (GWh) and as a percentage of the net energy for load (NEL). Renewable energy as a percentage of NEL is expected to increase from 7.8 percent in 2024 to 29.2 percent in 2034. On a statewide level, solar generation will account for 27.7 percent of NEL in 2034.

Table 1: State of Florida - Renewable Energy Generation

Utility	2024 Actual			2034 Projected		
	NEL	Renewables		NEL	Renewables	
	GWh	GWh	% NEL	GWh	GWh	% NEL
FPL	146,102	13,449	9.2%	160,473	56,831	35.4%
DEF	44,200	3,354	7.6%	46,359	13,250	28.6%
TECO	21,852	2,235	10.2%	23,374	5,870	25.1%
FMPA	7,172	161	2.2%	7,006	340	4.9%
GRU	1,903	253	13.3%	1,997	654	32.8%
JEA	13,254	507	3.8%	14,043	2,832	20.2%
LAK	3,509	28	0.8%	3,794	194	5.1%
OUC	8,206	408	5.0%	9,532	4,791	50.3%
TAL	2,849	96	3.4%	2,922	111	3.8%
SEC	17,359	383	2.2%	23,368	703	3.0%
STATE	266,406	20,874	7.8%	292,868	85,576	29.2%

Source: FRCC 2025 Regional Load and Resource Plan and TYSP Utilities' Data Responses

While solar makes notable contributions to NEL, it is not considered a firm resource and contributes only a portion of its capacity during the period of system peaks. Generally, solar makes a contribution toward summer peaks and no, or minimal, contribution to winter peaks. As the amount of solar generation in a utility system grows, this value is reduced as the net solar system peak is shifted further into the evening, when solar generation declines, increasing the need for non-solar generation to start or ramp up production. As a result, existing solar is considered firm towards summer peaks for approximately 35.4 percent of its capacity, while planned solar is considered firm for only 11.4 percent of its capacity.

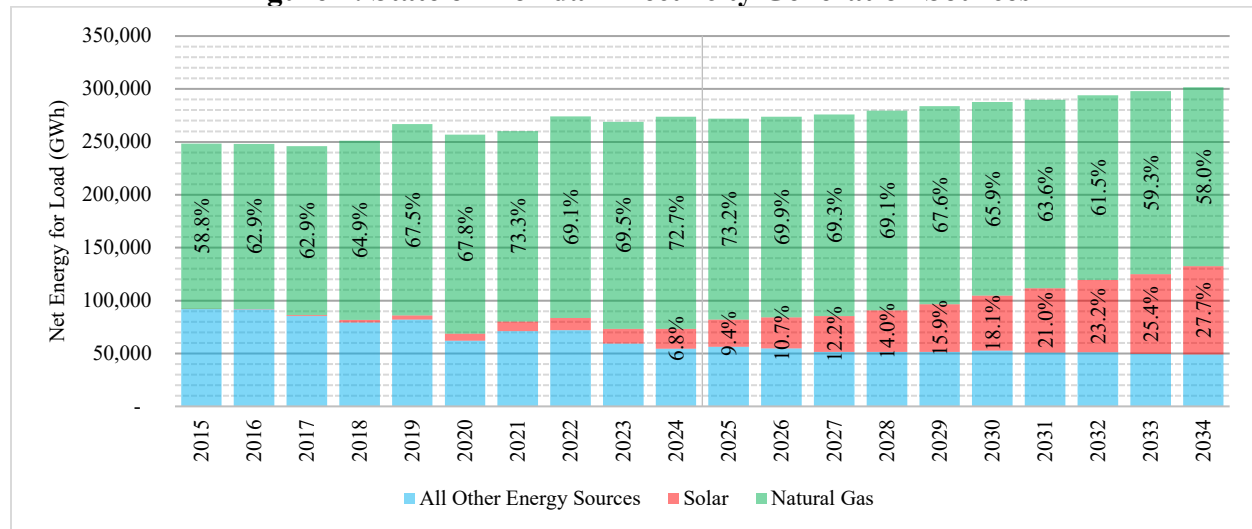
Battery Storage

Addressing this concern is a relatively new technological entry in Florida’s generation mix, energy storage, primarily in the form of batteries. While the first 1.5 MW pilot battery storage facility entered service in 2016, a total of 604 MW of battery storage was installed by 2024, and an additional 10,031 MW will enter service by 2034. Battery storage is a unique resource in that it can contribute to firm capacity and offers a fast ramp rate; however, it has a limited duration and requires charging from the grid, becoming load rather than generation. Battery storage can be charged by any generation resource. Given these characteristics, for reliability planning purposes, only 548 MW of existing battery storage and 5,673 MW of planned battery storage is considered firm for summer peaks. The Commission will continue to monitor technological developments in renewable generation and energy storage to cost-effectively address the state’s fuel diversity, reducing the dependence on fossil fuels, while still maintaining adequate resources to provide for customer loads.

Traditional Generation

Generating capacity within Florida is anticipated to grow to meet the increase in customer demand, with an approximate net increase of 1,715 MW of traditional generation over the planning horizon and with natural gas plant additions offset by coal and oil retirements. Natural gas electric generation, as a percent of NEL, is expected to decline from 72.7 percent in 2024 to 58.0 percent over the planning horizon. Figure 2 illustrates the use of natural gas as a generating fuel for electricity production in Florida compared to solar and all other energy sources combined. The total energy produced by solar generation is projected to exceed all other sources combined, excluding natural gas, by 2031.

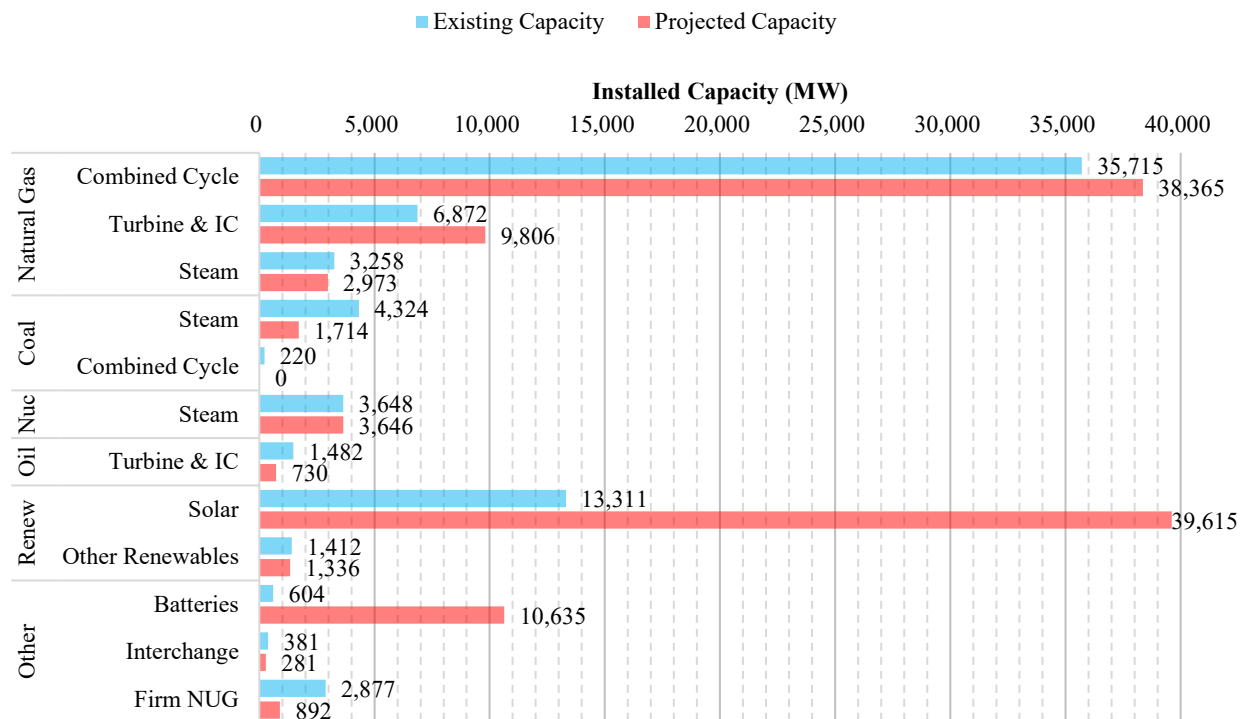
Figure 2: State of Florida - Electricity Generation Sources



Source: FRCC 2016-2025 Regional Load and Resource Plans

Figure 3 illustrates the present and future aggregate capacity mix of Florida based on the 2025 TYSPs. The capacity values in Figure 3 incorporate all proposed additions, changes, and retirements planned during the 10-year period. While natural gas-fired generating units represent a majority of capacity within the state, renewable capacity additions make up the majority of the projected net increase in generation capacity over the planning period. Solar generation is already the second highest category of installed capacity and will exceed natural gas combined cycle nameplate capacity by the end of the 10-year planning period. As mentioned previously, not all of the installed solar capacity provides a firm resource that is available to serve peak demand.

Figure 3: State of Florida - Current and Projected Installed Capacity



Source: FRCC 2025 Regional Load and Resource Plan and TYSP Utilities' Data Responses

The primary purpose of this review is to provide information regarding proposed electric power plants for local, regional, and state agencies to assist in the certification process. During the next 10 years, there are two new units planned by JEA and SEC that may require a determination of need from the Commission pursuant to Section 403.519, F.S., both natural gas-fired combined cycles, in 2030 and 2032, respectively. The Commission can anticipate filings for need determinations sometime in 2026 and 2028 for these units, assuming a petition is filed four years before the in-service date.

Future Considerations

Florida's electric utilities must consider changes in environmental regulations associated with existing generators and planned generation to meet Florida's electric needs. Developments in the U.S. Environmental Protection Agency (EPA) regulations may impact Florida's existing

generation fleet and proposed new facilities. For example, on June 17, 2025, the EPA published a proposed rule to repeal all Greenhouse Gas (GHG) standards for fossil fuel-fired power plants, arguing that GHG emissions from these plants do not significantly contribute to dangerous air pollution. On March 12, 2025, the EPA also announced that it will undertake 31 actions to advance President Trump’s Executive Orders. These actions include the reconsideration of regulations on power plants and introducing the Clean Power Plan 2.0, and the reconsideration of limitations, guidelines, and standards for steam powered electric generating units. These and other relevant EPA actions are further discussed in the Traditional Generation section below.

Emerging Trends

Florida’s electric industry is experiencing heightened demand for power from customers influenced by the potential expansion of data centers. Florida utilities recognize the associated substantial increase in load to serve such customers and, to the extent such load materialize, they will require significant new infrastructure in both generation and transmission. As such, the utilities are actively assessing the potential impact of load growth driven by the advent of large data centers, including protections to their existing customers from the risks associated with potential stranded costs incurred to install new or upgraded facilities to serve a new large data center. Increased loads can be met on the utility side by improving existing generation and transmission infrastructure to allow more energy-efficient production and delivery of electricity or with the addition of new resources such as battery energy storage. Other developments, such as potential new nuclear generation in the form of small modular reactors, may have the potential to change Florida’s energy landscape in the future. As these new technologies evolve, the Commission will continue its oversight as these impacts are included in future electric utility TYSPs.

Conclusion

The Commission has reviewed the 2025 TYSPs of Florida’s electric utilities and finds that the projections of load growth appear reasonable. The reporting utilities have identified sufficient additional generation facilities to maintain an adequate supply of electricity. The Commission will continue to monitor the impact of current and proposed EPA Rules, expansion of electric vehicle (EV) adoption, and the state’s dependence on natural gas for electricity production.

Based on its review, the Commission finds the 2025 TYSPs to be suitable for planning purposes. Since the plans are not a binding plan of action for electric utilities, the Commission’s classification of these plans as “suitable” or “unsuitable” does not constitute a finding or determination in docketed matters before the Commission.

Introduction

The TYSPs of Florida's electric utilities are the culmination of an integrated resource plan which is designed to give state, regional, and local agencies advance notice of proposed power plants and transmission facilities. The Commission receives comments from these agencies regarding any issues with which they may have concerns. The TYSPs are planning documents that contain tentative data that is subject to change by the utilities upon written notification to the Commission.

For any new proposed power plants and transmission facilities, certification proceedings under the Florida Electrical Power Plant Siting Act, Sections 403.501 through 403.518, F.S., or the Florida Electric Transmission Line Siting Act, Sections 403.52 through 403.5365, F.S., will include more detailed information than is provided in the TYSPs. The Commission is the exclusive forum for determination of need for electrical power plants, pursuant to Section 403.519, F.S., and for transmission lines, pursuant to Section 403.537, F.S. The TYSPs are not intended to be comprehensive, and therefore may not have sufficient information to allow regional planning councils, water management districts, and other reviewing state, regional, and local agencies to evaluate site-specific issues within their respective jurisdictions. Other regulatory processes may require the electric utilities to provide additional information as needed.

Statutory Authority

Section 186.801, F.S., requires that all major generating electric utilities submit a TYSP to the Commission at least every two years. Based on these filings, the Commission performs a preliminary study of each TYSP and makes a non-binding determination as to whether the plan is suitable or unsuitable. The results of the Commission's study are contained in this report and are forwarded to the Florida Department of Environmental Protection for use in subsequent proceedings. In addition, Section 377.703(2)(e), F.S., requires the Commission to collect and analyze energy forecasts, specifically for electricity and natural gas, and forward this information to the Department of Agriculture and Consumer Services. The Commission has adopted Rules 25-22.070 through 25-22.072, Florida Administrative Code (F.A.C.), in order to fulfill these statutory requirements and provide a solid framework for flexible, cost-effective utility resource planning. In this way, the Commission fulfills its oversight and regulatory responsibilities while leaving day-to-day planning and operations to utility management.

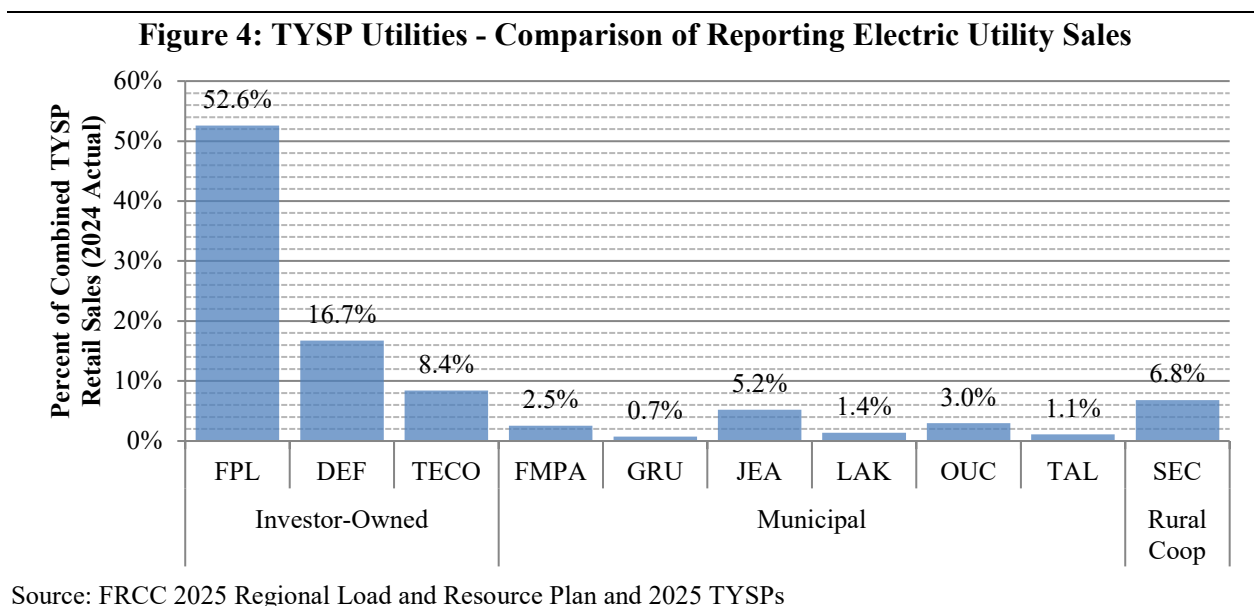
Applicable Utilities

Florida is served by 57 electric utilities, including 4 investor-owned utilities, 35 municipal utilities, and 18 rural electric cooperatives. Pursuant to Rule 25-22.071(1), F.A.C., only electric utilities with an existing generating capacity above 250 MW or a planned unit with a capacity of 75 MW or greater are required to file a TYSP with the Commission every year.

In 2025, 10 utilities met these requirements and filed a TYSP, including 3 investor-owned utilities, 6 municipal utilities, and 1 rural electric cooperative. The investor-owned utilities, in order of size, are Florida Power & Light Company (FPL), Duke Energy Florida, LLC (DEF), and Tampa Electric Company (TECO). The municipal utilities, in alphabetical order, are Florida Municipal Power Agency (FMPA), Gainesville Regional Utilities (GRU), JEA (formerly Jacksonville Electric Authority), Lakeland Electric (LAK), Orlando Utilities Commission (OUC), and City of

Tallahassee Utilities (TAL). The sole rural electric cooperative filing a 2025 TYSP is Seminole Electric Cooperative (SEC). Collectively, these utilities are referred to as the TYSP Utilities.

Figure 4 illustrates the comparative size of the TYSP Utilities in terms of each utility's percentage share of the combined TYSP Utilities' retail energy sales in 2024. Collectively, the reporting investor-owned utilities account for 77.7 percent of statewide retail energy sales, while the municipal and cooperative utilities make up approximately 20.8 percent of the statewide retail energy sales. The remainder is associated with non-reporting entities due to their limited size.



Required Content

The Commission requires each reporting utility to provide information on a variety of topics as required by Section 186.801(2) F.S. Schedules describe the utility's existing generation fleet, customer composition, demand and energy forecasts, fuel requirements, reserve margins, changes to existing capacity, and proposed power plants and transmission lines. The utilities also provide a narrative documenting the methodologies used to forecast customer demand and the identification of resources to meet that demand over the 10-year planning period. This information, supplemented by additional data requests, provides the basis of the Commission's review.

Additional Resources

The Florida Reliability Coordinating Council (FRCC) compiles utility data on both a statewide basis and for Peninsular Florida, which excludes the area west of the Apalachicola River. This provides aggregate data for the Commission's review. Each year, the FRCC publishes a Regional Load and Resource Plan, which contains historic and forecast data on demand and energy, capacity and reserves, and proposed new generating units and transmission line additions. For certain comparisons, the Commission employs additional data from various government agencies, including the U. S. Energy Information Administration and the Florida Department of Highway Safety and Motor Vehicles.

Structure of the Commission's Review

The Commission's review is divided into multiple sections. The Statewide Perspective provides an overview of Florida as a whole, including discussions of load forecasting, renewable generation, and traditional generation. The Utility Perspectives provides more focus, discussing the various issues facing each electric utility and its unique situation. Comments collected from various review agencies, local governments, and other organizations are included in Appendix A.

Conclusion

Based on its review, the Commission finds all 10 reporting utilities' 2025 TYSPs to be suitable for planning purposes. During its review, the Commission has determined that the projections for load growth appear reasonable and that the reporting utilities have identified sufficient generation facilities to maintain an adequate supply of electricity.

The Commission notes that the TYSPs are non-binding, and a classification of suitable does not constitute a finding or determination in any docketed matter before the Commission, nor an approval of all planning assumptions contained within the TYSPs.

Statewide Perspective

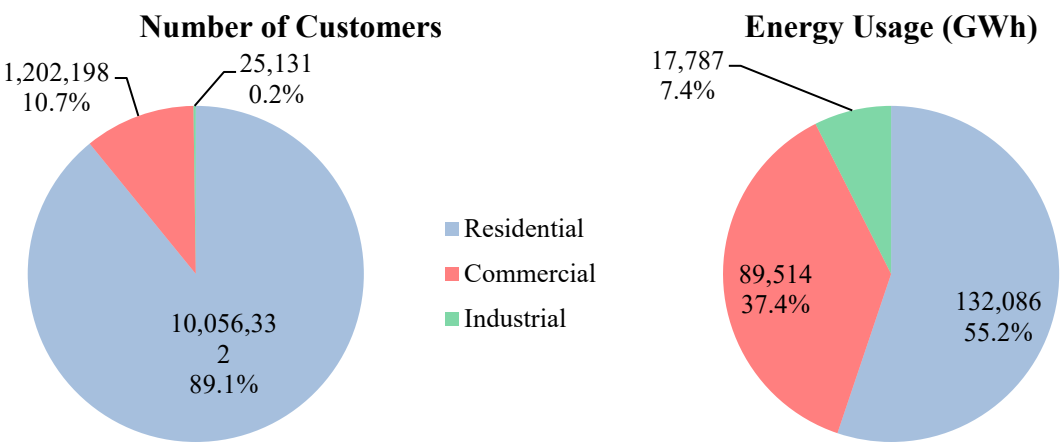
Load Forecasting

Forecasting customer energy needs or load is a fundamental component of electric utility planning. In order to maintain an adequate and reliable system, utilities must project and prepare for changes in overall electricity consumption patterns. These patterns are affected by the number and type of customers, and factors that impact customer usage including weather, economic conditions, housing size, building codes, appliance efficiency standards, new technologies, and demand-side management. Florida’s utilities use well-known and tested methodologies for preparing customer, energy, and peak demand forecasts.

Electric Customer Composition

Utility companies categorize their customers by residential, commercial, and industrial classes. As illustrated in Figure 5, residential customers account for 89.1 percent of the total, followed by commercial (10.7 percent) and industrial (0.2 percent) customers. Commercial and industrial customers make up a sizeable percentage of energy sales due to their higher energy usage per customer. Residential customers in Florida make up the largest portion of retail energy sales. Florida’s residential customers accounted for 55.2 percent of retail energy sales in 2024, compared to a national average of approximately 37.4 percent in 2023.³

Figure 5: State of Florida - Electric Customer Composition in 2024



Source: FRCC 2025 Regional Load and Resource Plan

Growth Projections

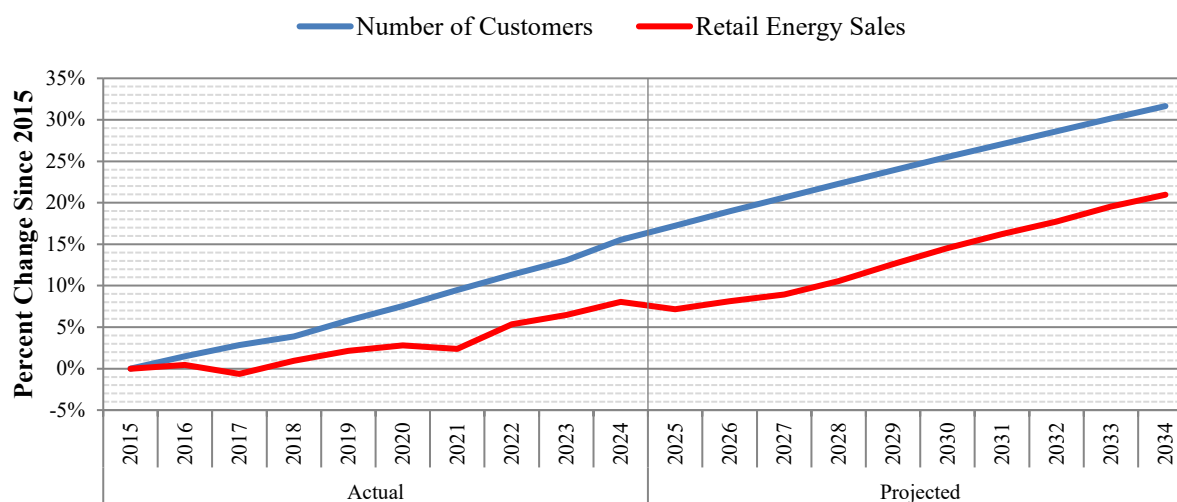
For the next 10-year period, Florida’s weather normalized retail energy sales are projected to grow at 1.35 percent per year, compared to the 0.86 percent actual annual increase experienced during the 2015-2024 period. The number of Florida’s electric utility customers is anticipated to grow at an average annual rate of about 1.30 percent for the next 10-year period, compared to the 1.62

³ U.S. Energy Information Administration – Electric Power Annual, released October 17, 2024.

percent actual annual increase experienced during the last decade. These trends are showcased in Figure 6.

As shown in Figure 6, Florida utilities' total retail energy sales reached a historical peak in 2024, surpassing the most recent peak that was reached in 2022. Several factors converged to contribute to this effect: continued growth in the number of retail customers as more people relocated to the state; warmer-than-normal weather conditions; and a surge in economic activity within the state's tourism and service sectors as they continued to recover from the COVID-19 pandemic, leading to increased electricity consumption across various industries. Florida utilities' total retail energy sales are projected to continuously grow at a moderate annual average rate for the next 10 years. This sales growth is driven by an anticipated growth in customers and business activity (such as the addition of large load customers like data centers) as well as the expected increased level of adoption of EV vehicles.

Figure 6: State of Florida - Growth in Customers and Sales



Source: FRCC 2025 Regional Load and Resource Plan

The projected retail energy sales trend reflects the product of the utilities' forecasted number of customers and forecasted energy usage per customer (UPC). The key factor affecting utilities' number of customers is population growth. The key factors affecting utilities' average UPC includes weather variability, economic conditions, and changes in customer behavior or operations; hence, the corresponding information is utilized to develop the forecast models for projecting future growth of UPC. The projected growth rate of retail energy sales is impacted by these underlying key factors.

With respect to the UPC projection over the current forecast period, FPL's residential class UPC is expected to decline gradually over time, primarily driven by continued improvements in energy efficiency and increasing customer adoption of energy-saving behaviors and technologies. FPL's commercial class UPC is expected to be generally flat to slightly declining for similar reasons, and

its industrial UPC is predicted to increase modestly overall, driven by the additional usage by expected new large load customers.

Meanwhile, DEF reported that its residential and commercial UPC, respectively, decreased at a compounded annual growth rate of 0.7 percent and 0.8 percent. This decrease is primarily driven by fluctuations in price of electricity, end-use appliance saturation and efficiency improvements, more stringent building codes, housing type/size, and the energy source of air conditioning equipment. In addition, DEF is aware that more recently, the customer's ability to self-generate has begun to make an impact on the UPC numbers. For example, DEF noted a small percentage of industrial/commercial customers have chosen to install their own natural gas generators, reducing energy consumption from the power grid. Similarly, residential and some commercial accounts have reduced their utility requirements by installing solar panels behind the meter. DEF also noted that, while the penetration of plug-in EVs has grown, working to increase residential UPC, rooftop solar generation continues to outweigh consumption from EV.

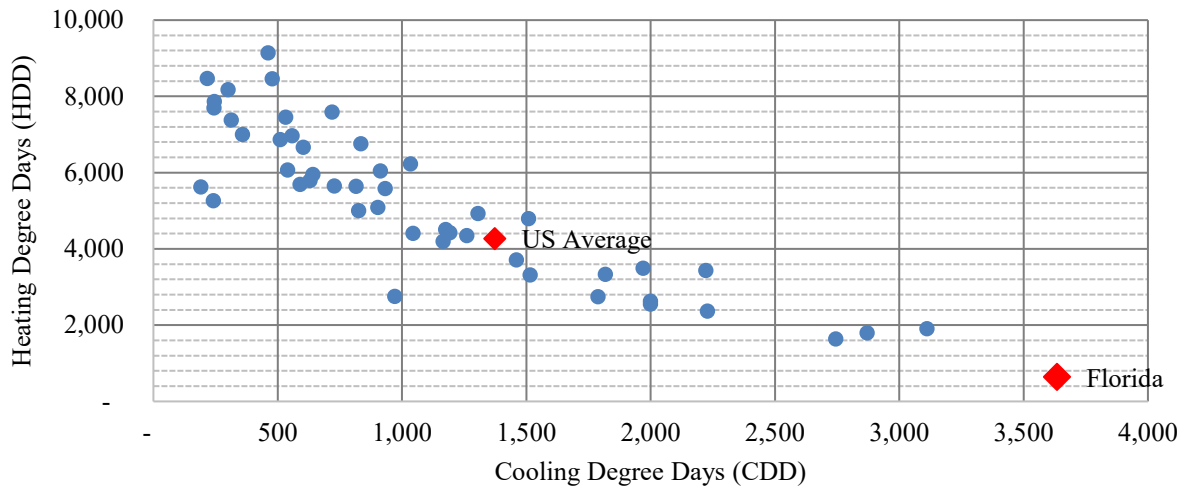
In west central Florida, TECO's residential class UPC is expected to decline at an average annual rate of 0.3 percent, primarily due to increases in appliance efficiencies, lighting efficiencies, energy efficiency in new homes, conservation efforts, and housing mix. TECO's commercial and industrial UPC are projected to decrease slightly at a rate of 0.1 percent and 0.2 percent a year, respectively. Likewise, other TYSP Utilities reported that the downward trend in UPC is due to advancements in technologies for energy efficiency, renewable generation, and alternative energy sources, with some TYSP Utilities expecting that increased residential at-home EV charging and the impact of anticipated energy-intensive commercial/industrial customers will mitigate this downward pressure to some extent.

Peak Demand

The aggregation of each individual customer's electric consumption must be met at all times by Florida's electric utilities to ensure reliable service. The time at which customers demand the most energy simultaneously is referred to as peak demand. While retail energy sales dictate the amount of fuel consumed by the electric utilities to deliver energy, peak demand determines the amount of generating capacity required to deliver that energy at a single moment in time. As a result of the high contribution of residential customers to NEL, Florida's utilities are influenced more by trends in residential energy usage, which tend to be associated with weather conditions.

Florida's unique climate plays an important role in electric utility planning, with the highest number of cooling degree days and lowest number of heating degree days within the continental United States, as shown in Figure 7. As such, most of Florida's utilities experience their peak demand during summer months. However, Florida's residential customers rely more upon electricity for heating than the national average, with only a small portion using alternate fuels such as natural gas or oil for home heating needs. Even with the low frequency of heating days required, such reliance can impact winter peak demand.

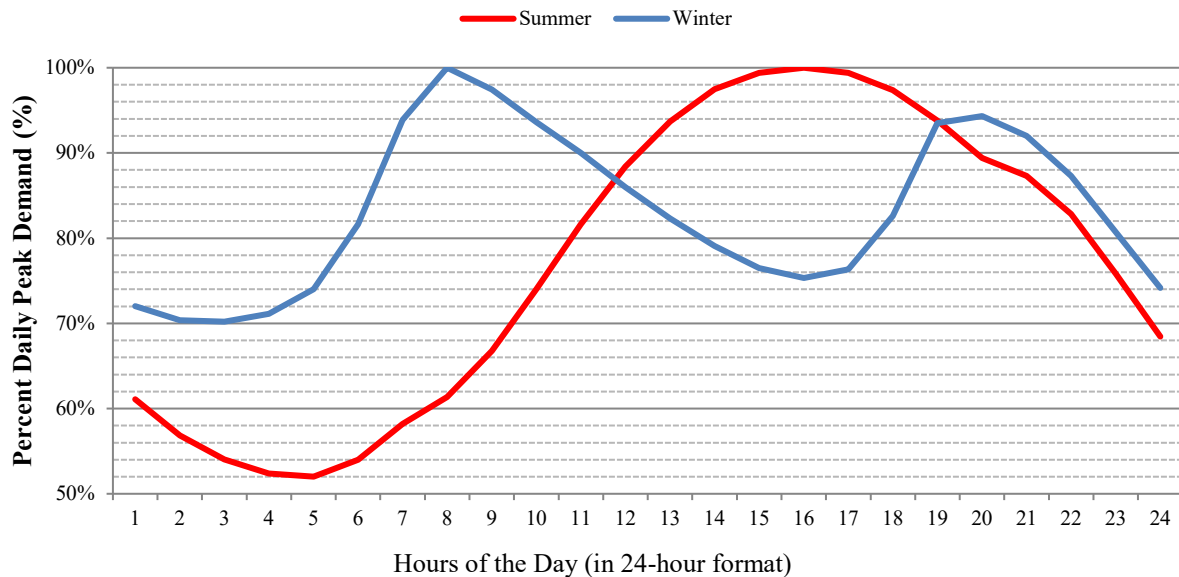
Figure 7: National - 20 Year Average Climate Data by State (Continental U.S.)



Source: U.S. National Oceanic and Atmospheric Administration Data

Seasonal weather patterns are therefore a primary factor, with peak demands calculated separately for the summer and winter periods annually, based on increased usage to meet home cooling (summer) and heating (winter) demand. Figure 8 illustrates a daily load curve for a typical day for each season. In summer, air-conditioning needs increase throughout the day, climbing steadily until a peak is reached in the late afternoon and then declining into the evening. In winter, electric heat and electric water heating produce a higher base level of usage, with a spike in the morning and an additional spike in the evening.

Figure 8: TYSP Utilities - Example Daily Load Curves

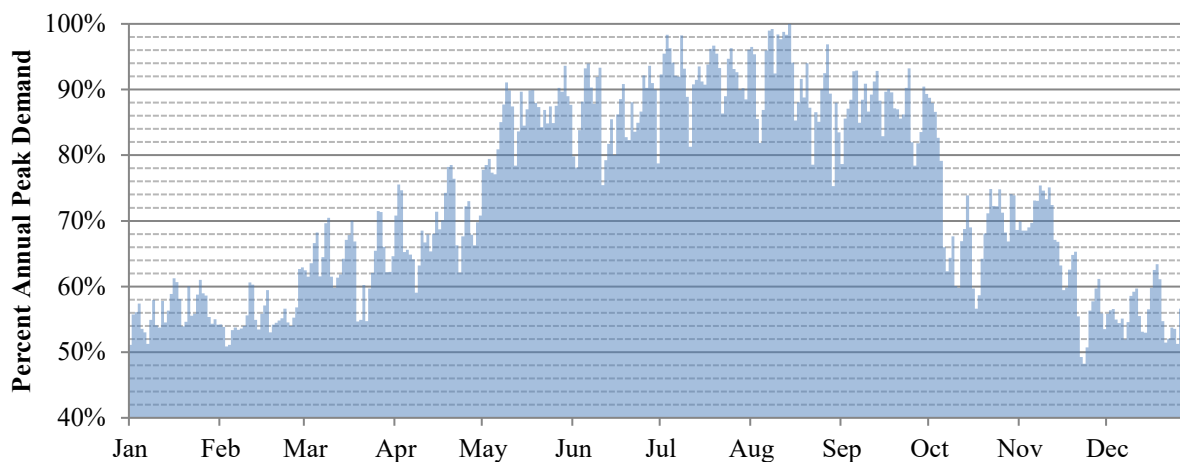


Source: TYSP Utilities' Data Responses

Florida is typically a summer-peaking state, meaning that the summer peak demand generally exceeds winter peak demand, and therefore controls the amount of generation required. Higher temperatures in summer also reduce the efficiency of generation, with high water temperatures reducing the quality of cooling provided, and can sometimes limit the quantity as units may be required to operate at reduced power or go offline based on environmental permits. Conversely, in winter, utilities can take advantage of lower ambient air and water temperatures to produce more electricity from a power plant.

As daily load varies, so do seasonal loads. Figure 9 shows the 2024 daily peak demand as a percentage of the annual peak demand for the reporting investor-owned utilities combined. Typically, winter peaks are short events while summer demand tends to stay at near annual peak levels for longer periods. The periods between seasonal peaks are referred to as shoulder months, in which the utilities take advantage of lower demand to perform maintenance without impacting their ability to meet daily peak demand.

Figure 9: TYSP Utilities - Daily Peak Demand (2024 Actual)



Source: 2025 TYSP Utilities' Data Responses (Investor-Owned Utilities Only)

Florida's utilities assume normalized weather in forecasts of peak demand. During operation of their systems, they continuously monitor short-term weather patterns. Utilities adjust maintenance schedules to ensure the highest unit availability during the utility's projected peak demand, bringing units back online if necessary or delaying maintenance until after a weather system has passed.

Electric Vehicles

Other trends that may impact customer peak demand and energy consumption are also examined by utilities, including new sources of energy consumption, such as EVs. The reporting TYSP Utilities estimate approximately 576,550 plug-in EVs will be operating in Florida by the end of 2025. The Florida Department of Highway Safety and Motor Vehicles lists the number of registered automobiles, heavy trucks, and buses in Florida, as of January 5, 2025, at 18.88 million,

resulting in an approximate 3.05 percent penetration rate of electric vehicles, up from 2.30 percent last year.⁴

TYSP Utilities’ projections of EV ownership, public charging stations, and impacts to their electric grid are summarized in Table 2. Florida’s electric utilities anticipate continued growth in the EV market, albeit at a somewhat reduced rate from last year, with EV ownership anticipated to increase to 4,420,779 EVs operating within the reporting utilities’ electric service territories by the end of 2034. While approximately 40,000 charging stations are estimated to be available across the state by the end of 2025, more than 266,000 charging stations are anticipated by 2034. The projected EV charging station amounts listed in Table 2 include both normal and “quick-charge” public charging stations.⁵ EV annual energy consumption is expected to increase from 0.9 percent of retail energy sales in 2024 to 6.5 percent by 2034.

Table 2: TYSP Utilities - Electric Vehicle Projections

Year	EVs	EV Charging Stations	Grid Impacts		
			Annual Energy	Summer Peak	Winter Peak
	(-)	(-)	(GWh)	(MW)	(MW)
2025	576,550	39,887	2,109	401.5	166.9
2026	793,136	52,121	2,942	561.1	234.4
2027	1,054,941	69,641	3,983	763.8	316.7
2028	1,370,720	90,453	5,243	1,002.9	417.4
2029	1,744,984	115,023	6,743	1,290.7	536.5
2030	2,175,781	136,453	8,480	1,624.1	678.2
2031	2,670,121	167,087	10,561	2,029.9	846.4
2032	3,220,237	195,490	12,930	2,492.7	1,041.7
2033	3,805,844	230,430	15,367	2,980.4	1,243.0
2034	4,420,779	266,575	17,945	3,487.0	1,457.3

Source: TYSP Utilities’ Data Responses

A major factor driving EV growth in this state is reduced range anxiety due to the rapid expansion of charging infrastructure, with the reporting utilities projecting approximately 40,000 charging stations to be available by year-end 2025. Government agencies, private entities, municipalities, and electric utilities continue to work together to expand charging infrastructure throughout the state to meet this expected growth in EVs.

In order to prepare and accommodate for the increase in EV ownership, several utilities now offer programs or tariffs applicable to EV customers. While the nature of these programs/tariffs vary among utilities, many include Time-of-Use rates, rebates on certain charging station installations, and programs designed to increase general outreach, education, and awareness of the EV market. The Commission will continue to closely monitor the status of the EV industry to ensure it is prepared to address any regulatory issues related to the future energy and demand impacts of EVs in Florida.

⁴ Florida Department of Highway Safety and Motor Vehicles January 2025 Vehicle and Vessel Reports and Statistics.

⁵ “Quick-charge” public EV charging stations are those that require a service drop greater than 240 volts and/or use three-phase power.

Data Centers

Existing Data Centers

The TYSP Utilities reported that there are some data centers currently in operation, as shown in Table 3. These existing data centers are relatively small, are being served by existing generation, and have no known negative impacts on reliability.

Table 3: TYSP Utilities - Data Centers by Utility

	Existing Data Centers*			
	No. of Data Centers	Total Energy Usage in 2024	Impact to Summer Peak Demand	Impact to Winter Peak Demand
		(GWhs)	(MWs)	(MWs)
FPL	62	283.0	30.2	30.2
DEF	5	48.0	14.5	7.0
TECO	14	71.4	11.0	10.5
JEA	4	38.1	6.3	6.2
LAK	1	4.1	---	---
Total	86	444.6	62.0	53.8

* FMPPA, GRU, OUC, SEC and TAL did not report any existing data centers.

Source: TYSP Utilities' data request responses.

As general practice, utilities currently do not separately identify data centers. FPL, for example, identified existing accounts associated with data centers through a web search of companies performing that service and then matched those companies to FPL records.

Emerging Data Centers

Most of the TYSP Utilities reported that they have received inquiries from potential new large-scale data centers. Some of these utilities have included the potential data center-related load requirements in their respective TYSPs. The scale of energy and demand use of such customers is much larger than the data centers the utilities reported are currently in operation. According to a 2025 report published by Electric Power Research Institute, titled "Grid Flexibility Needs and Data Center Characteristics," data centers range from small to large, or hyper-scale, with larger data centers having a greater impact on system-wide demand and flexibility needs.

FPL believes there is a potential for customers with significant new load requirements to be served beginning in 2028 and has included a projection of these additions in its forecasts through 2034. FPL has projected that the data center peak demand and total energy usage would grow, respectively, from 172 MW and 1,281 GWh in 2028 to 732 MW and 5,450 GWh in 2034.

Similar to FPL, DEF has received inquiries from a number of potential new customers, but the Utility indicated that none of these inquiries have progressed to the level of commitment that would warrant inclusion in the DEF 2025 TYSP load forecast. Meanwhile, TECO's 2025 TYSP does not include projections of the large data centers loads due to no firm end-use customer commitments. JEA stated that it has received numerous data center inquiries over the past year and that in order to serve them, JEA would need to construct more generating resources. OUC stated that it

anticipates having discussions with potential data centers to better understand the timing and magnitude of such new loads. Similarly, SEC reported that there has been increasing interest by data centers and developers in several member service territories. As such, SEC, as the generation provider to its member cooperatives, has begun issuing quarterly surveys with each member to identify potential new large loads.

Large data centers are unique types of energy consumption sources, given their significant and constant load requirements and the potential for high costs to extend service to them. Many of the potential issues associated with serving such customers will be directly related to the size and scope of the specific data center project in question. Any necessary system upgrades to accommodate incremental load, along with the deployment of generation resources to safely and reliably serve existing and new load, are also important concerns that must be addressed. Florida utilities recognize the associated substantial increase in load to serve such customers, and to the extent such loads materialize, they will require significant new infrastructure in both generation and transmission. As such, the TYSP Utilities are actively assessing the potential impact of load growth driven by the advent of large data centers, including protections to their existing customers from the risks associated with potential stranded costs incurred to install new or upgraded facilities to serve a new large data center.

Demand-side Management (DSM)

Florida's electric utilities also consider how the efficiency of customer energy consumption changes over the planning period. Changes in government mandates, such as building codes and appliance efficiency standards, reduce the amount of energy consumption for new construction and electric equipment. Electric customers, through the power of choice, can elect to engage in behaviors that decrease peak load or annual energy usage. Examples include turning off lights and fans in unoccupied rooms, increasing thermostat settings during the summer, and purchasing appliances that exceed efficiency standards. While a certain portion of customers will engage in these activities without incentives due to economic, aesthetic, or environmental concerns, other customers may lack information or require additional incentives. Demand-Side Management (DSM) programs represents an area where Florida's electric utilities can empower and educate its customers to make choices that reduce peak load and annual energy consumption.

Florida Energy Efficiency and Conservation Act (FEECA)

In 1980, the Florida Legislature passed the Florida Energy Efficiency and Conservation Act (FEECA), which is codified in Sections 366.80 through 366.83, F.S., and Section 403.519, F.S. Under FEECA, the Commission is required to set appropriate goals for increasing the efficiency of energy consumption and increasing the development of demand-side renewable energy systems for electric utilities of a certain size, known as the FEECA Utilities.⁶ Of the TYSP Utilities, these include the three investor-owned electric utilities, FPL, DEF, TECO, and two municipal electric utilities, JEA and OUC, and together represent approximately 86 percent of 2024 retail electric sales reported in the state. The FEECA Utilities offer DSM programs for residential, commercial, and industrial customers. Energy audit programs are designed to provide an overview of customer energy usage and to evaluate conservation opportunities, including behavioral changes, low-cost

⁶ FEECA also applies to Florida Public Utilities Company (FPUC), a non-generating investor-owned electric utility. As FPUC purchases power from other generating entities and does not own or operate its own generation resources, it is not required to file a TYSP.

measures customers can undertake themselves, and participation in utility-sponsored DSM programs.

In 2024, the Commission held a hearing and established goals for each of the FEECA Utilities for the period 2025 through 2034. In 2025, the Commission reviewed and approved DSM Plans for each FEECA electric utility designed to meet its goals. The Commission is scheduled to have its next goalsetting proceeding no later than 2029 for the period 2030 through 2039.

DSM Programs

DSM programs are generally divided into three categories: interruptible load, load management, and energy efficiency. The first two are considered dispatchable, and are collectively known as demand response, meaning that the utility can call upon them during a period of peak demand or other reliability concerns, but otherwise they are not utilized. In contrast, energy efficiency measures are considered passive and are always working to reduce customer demand and energy consumption.

Interruptible load is achieved through the use of agreements with large customers to allow the utility to interrupt the customer's load, reducing the generation required to meet system demand. Interrupted customers may use back-up generation to fill their energy needs, or cease operation until the interruption has passed. A subtype of interruptible load is curtailable load, which allow the utility to interrupt only a portion of the customer's load. In exchange for the ability to interrupt these customers, the utility offers a discounted rate for energy or other credits which are paid for by all ratepayers.

Load management is similar to interruptible load, but focuses on smaller customers and targets individual appliances. The utility installs a device on an electric appliance, such as a water heater or air conditioner, which allows for remote deactivation for a short period of time. Load management activations tend to have less advanced notice than those for interruptible customers, but tend to be activated only for short periods and are cycled through groups of customers to reduce the impact to any single customer. Due to the focus on specific appliances, certain appliances would be more appropriate for addressing certain seasonal demands. For example, load management programs targeting air conditioning units would be more effective to reduce a summer peak, while water heaters are more effective for reducing a winter peak. As of 2025, the total amount of demand response resources available for reduction of peak load is 3,345 MW for summer peak and 3,127 MW for winter peak. Demand response is anticipated to increase only marginally to approximately 3,412 MW for summer peak and 3,157 MW for winter peak by 2034. Residential load management is anticipated to decline slightly, while interruptible load is level and commercial/industrial demand response has a slight increase.

Energy efficiency or conservation measures also have an impact on peak demand, and due to their passive nature do not require activation by the utility. Conservation measures include improvements in a home or business' building envelope to reduce heating or cooling needs, or the installation of more efficient appliances. By installing additional insulation, energy-efficient windows or window films, and high efficiency appliances, customers can reduce both peak demand and annual energy consumption, resulting in lower energy bills. DSM programs work in conjunction with building codes and appliance efficiency standards to increase energy savings

above the minimum required by local, state, or federal regulations. As of December 31, 2024, energy efficiency is responsible for peak load reductions of 4,732 MW for summer peak and 4,447 MW for winter peak. Energy efficiency is anticipated to increase to approximately 5,731 MW for summer peak and 5,231 MW for winter peak by 2034.

Forecast Load and Peak Demand

The historic and forecasted seasonal peak demand and annual energy consumption values for Florida are illustrated in Figure 10. The forecasts shown below are based upon normalized weather conditions, while the historic demand and energy values represent the actual impact of weather conditions on Florida's electric customers. Florida relies heavily upon both air conditioning in the summer and electric heating in the winter, so both seasons experience a great deal of variability due to severe weather conditions.

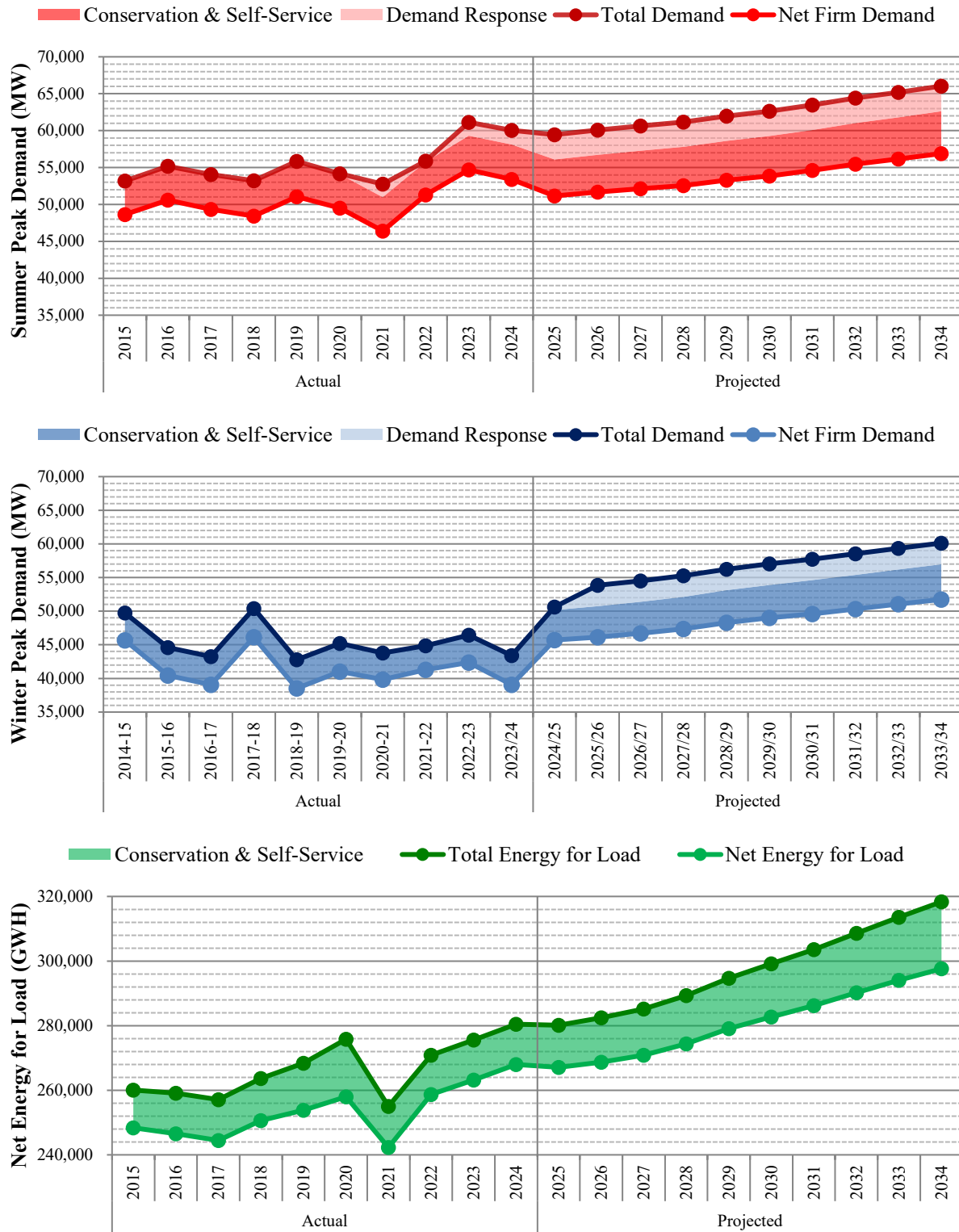
DSM, including demand response and energy efficiency, along with self-service generation, is included in each graph appearing in Figure 10 for seasonal peak demand and annual energy for load. The total demand or total energy for load represents what otherwise would need to be served if not for the impact of these programs and self-service generators. The net firm demand is used as a planning number for the calculation of generating reserves and determination of generation needs for Florida's electric utilities.

Demand response is included in Figure 10 in two different ways based upon the time period considered. For historic values of seasonal demand, the actual rates of demand response activation are shown, not the full amount of demand response that was available at the time. Overall, demand response has only been partially activated, as sufficient generation resources were available during the annual peak. Residential load management has been utilized to a limited extent during peak periods, with even less interruptible load being activated.

For forecast values of seasonal demand, it is assumed that all demand response resources will be activated during peak. The assumption of all demand response being activated reduces generation planning need. Based on future operating conditions, if an electric utility has sufficient generating capacity and it is economical to serve all customers loads, demand response would likely be inactive or only partially activated.

As previously discussed, Florida is normally a summer-peaking state and has been for the past 10 years. This trend is anticipated to continue, with the next 10 forecasted years all anticipated to be summer peaking. Based upon current forecasts using normalized weather data, Florida's electric utilities anticipate a gradual increase in both summer and winter net firm demand during the planning period.

Figure 10: State of Florida - Historic & Forecast Seasonal Peak Demand & Annual Energy



Source: FRCC 2025 Regional Load and Resource Plan

Forecast Methodology

Load forecasting is an essential requirement of all electric utility companies for purposes of system planning. In order for utilities to reliably and cost-effectively serve their respective customers, they must be able to accurately determine their energy and demand requirements. Thus, the load forecast function facilitates the ongoing balance between system demand and system supply.

Load forecasting can be divided into three types depending on the forecasting horizon: short-, medium-, and long-term. Short-term load forecasting denotes forecast horizons of up to one week ahead. Medium-term load forecasting ranges from one week to one year ahead. Long-term load forecasting typically targets forecast horizons of one to 10 years, and sometimes up to several decades. Long-term load forecasting provides the essential load requirement data that a utility must have in order to effectively modify its system of generation, transmission, and distribution assets. Load forecasts directly impact the timing, type, and location of asset expansions, replacements, and retirements. Hence, the load forecast function plays a vital role in an electric utility's system planning and, in Florida, serves as the foundation of a utility's TYSP.

Florida's electric utilities perform long-term forecasts of peak demand and annual energy sales using various forecasting models, including econometric and end-use models, and other forecasting techniques such as surveys. In the development of econometric models, the utilities use historical data sets including dependent variables (e.g., winter and summer peak demand per customer, residential energy use per customer) and independent variables (e.g., peak day minimum temperature, real personal income, heating degree days and cooling degree days, etc.) to infer relationships between the two types of variables. These historical relationships, combined with available forecasts of the independent variables and the utilities' forecasts of customers, are then used to forecast the peak demand and energy sales. For some customer classes, such as industrial customers, surveys may be conducted to determine the customer's specific expectations for their own future electricity consumption.

Forecasting models for energy sales are prepared by revenue class (e.g., residential, small and large commercial, small and large industrial, etc.). Commonly, the results of the models must be adjusted to take into account exogenous impacts, such as the impact of the recent growth in EV and distributed generation. The forecasting models for energy sales must also take into account DSM.

Another type of forecasting model, sometimes used to project energy use in conjunction with econometric models, is an "end-use model." These models can capture trends in appliance and equipment saturation and efficiency, as well as building size and thermal efficiency, on customers' energy use. If such end-use models are not used, the econometric models for energy often include an index comprised of efficiency standards for air conditioning, heating, and appliances, as well as construction codes for recently built homes and commercial buildings.

Florida's electric utilities rely upon data that is sourced from public and private entities for historic and forecast values of specific independent variables used in econometric modeling. Public resources such as the University of Florida's Bureau of Economic and Business Research, which provides county-level data on population growth, and the U.S. Department of Commerce's Bureau of Labor Statistics, which publishes the Consumer Price Index, are utilized along with private forecasts for economic growth from macroeconomic experts, such as Moody's Analytics. By

combining historic and forecast macroeconomic data with customer and climate data, Florida's electric utilities project future load conditions.

Historically, the various forecast models and techniques used by Florida's electric utilities are commonly used throughout the industry; and each utility has developed its own individualized approach to project load. The models have relied upon dependent and independent variable data to project energy sales and demand amounts that exist within a probabilistic range. The resulting forecasts allow each electric utility to evaluate its individual needs for new generation, transmission, and distribution resources to meet customers' current and future needs reliably and cost-effectively. Again, for the 2025 TYSPs, Florida's electric utilities used these same types of models and techniques to prepare their forecasts.

Accuracy of Retail Energy Sales Forecast

For each reporting TYSP Utility, the Commission reviewed the historic forecast accuracy of past retail energy sales forecasts. The standard methodology for the Commission's review involves comparing actual retail energy sales for a given year to energy sales forecasts made three, four, and five years prior. For example, the actual 2024 retail energy sales were compared to the forecasts made in 2019, 2020, and 2021. The resulting differences, expressed as a percentage error rate, are used to determine each utility's historic forecast accuracy by applying a five-year rolling average. An average error with a negative value indicates an under-forecast, while a positive value represents an over-forecast. An absolute average error provides an indication of the total magnitude of error, regardless of the tendency to under or over forecast. For the 2025 TYSPs, determining the accuracy of the five-year rolling average forecasts involves comparing the actual retail energy sales for the period 2015 through 2024 to forecasts made between 2006 and 2020. These are summarized in Table 4.

Table 4: TYSP Utilities - Accuracy of Retail Energy Sales Forecasts
(Five-Year Rolling Average)*

TYSP Year	Five-Year Analysis Period	Forecast Years Analyzed	Forecast Error (%)	
			Average	Absolute Average
2016	2015 - 2011	2011 - 2006	12.5%	12.5%
2017	2016 - 2012	2012 - 2007	9.1%	9.1%
2018	2017 - 2013	2013 - 2008	6.0%	6.0%
2019	2018 - 2014	2014 - 2009	3.5%	3.5%
2020	2019 - 2015	2015 - 2010	2.1%	2.3%
2021	2020 - 2016	2016 - 2011	1.6%	2.0%
2022	2021 - 2017	2017 - 2012	1.0%	1.6%
2023	2022 - 2018	2018 - 2013	(0.1%)	1.4%
2024	2023 - 2019	2019 - 2014	(1.0%)	1.6%
2025	2024 - 2020	2020 - 2015	(1.8%)	2.0%

Source: 2006-2025 TYSPs

* Inputs used including utilities' revisions to the corresponding prior TYSP-reported actual and/or projected data.

To verify whether more recent forecasts lowered the error rates, an additional analysis was conducted to determine, with more detail, the source of high error rates in terms of forecast timing. Table 5 provides the error rates for forecasts made between one to six years prior, along with the three-year average and absolute average error rates for the forecasting period of a three to five-year period that was also used in the analysis in Table 4.

As displayed in Table 5, the TYSP Utilities' retail energy sales forecasts show large positive error rates during the recession-impacted period 2012 through 2015. Starting in 2015, the error rates have declined considerably and the error rates calculated based on recent years' TYSPs continue to show lower forecast error rates, compared to the peak value of the error rates related to 2012 - 2014 sales forecasts. Most of the last five years' four-year ahead, three-year ahead, two-year ahead, and one-year ahead forecasts all bear negative error rates (under-forecasts). Additionally, the last three years' six-year ahead and five-year ahead forecasts all render negative error rates as well. Note that all of the 2022-, 2023-, and 2024-related forecasts made between one to six years prior show relatively higher negative error rates. This is due to the respective annual retail energy sales achieved which is largely attributable to the very hot weather Florida experienced in the recent years.

**Table 5: TYSP Utilities - Accuracy of Retail Energy Sales Forecasts - Annual Analysis
(Analysis of Annual and Three-Year Average of Three- to Five- Prior Years)***

Year	Annual Forecast Error Rate (%)						3-5 Year Error (%)	
	Years Prior						Average	Absolute Average
	6	5	4	3	2	1		
2012	26.4%	26.1%	23.2%	8.6%	4.0%	3.8%	19.3%	19.3%
2013	28.6%	26.3%	10.0%	6.0%	5.6%	3.0%	14.1%	14.1%
2014	27.2%	9.7%	6.0%	5.6%	2.7%	2.1%	7.1%	7.1%
2015	7.2%	3.5%	3.1%	0.9%	(0.1%)	(1.3%)	2.5%	2.5%
2016	4.2%	4.3%	2.2%	1.1%	0.1%	(1.1%)	2.5%	2.5%
2017	6.9%	4.8%	3.5%	2.4%	1.5%	(0.2%)	3.6%	3.6%
2018	4.2%	2.7%	1.6%	0.6%	(1.3%)	(1.2%)	1.6%	1.6%
2019	2.8%	1.9%	0.8%	(1.4%)	(1.4%)	(2.0%)	0.4%	1.3%
2020	2.4%	1.3%	(1.0%)	(1.1%)	(1.9%)	(1.2%)	(0.3%)	1.1%
2021	2.6%	0.4%	0.0%	(0.8%)	(0.1%)	0.0%	(0.2%)	0.4%
2022	(1.6%)	(1.9%)	(2.9%)	(2.2%)	(2.1%)	(3.1%)	(2.3%)	2.3%
2023	(2.1%)	(3.3%)	(2.7%)	(2.5%)	(3.2%)	(2.6%)	(2.8%)	2.8%
2024	(3.9%)	(3.3%)	(3.3%)	(3.7%)	(3.2%)	(3.2%)	(3.4%)	3.4%

Source: 2006-2025 TYSPs

* Inputs used include utilities' revisions to the corresponding prior TYSP-reported actual and/or projected sales data.

Barring any unforeseen economic crises or atypical weather patterns, average forecasted energy sales error rates in the next few years are likely to be more reflective of the error rates shown for 2015 through 2024 in Table 5. However, all the major global and domestic events (e.g., the Russia-Ukraine war, intense conflicts in the Middle East, increased tariffs on foreign countries, supply chain issues, potential factors such as recession, increases in inflation rates, pandemic, etc.), individually or collectively, could inflict damage to the U.S. economy. As such, there remains

uncertainty as to what the economic impacts of such events will be going forward. Therefore, the actual retail energy sales over the next few years could differ from what Florida utilities projected in 2024 and earlier years. Consequently, average forecasted energy sales error rates during this period may deviate from the relatively low levels recorded since 2015. It is important to recognize that the dynamic nature of the economy, the weather, and even global health, political and economic issues present a degree of uncertainty for Florida utilities' load forecasts, ultimately impacting the accuracy of retail energy sales forecasts.

Renewables and Energy Storage

Pursuant to Section 366.91, F.S., the Legislature has found that it is in the public interest to promote the development of renewable energy resources in Florida. Section 366.91(2)(e), F.S., defines renewable energy in part, as follows:

“Renewable energy” means electrical energy produced from a method that uses one or more of the following fuels or energy sources: hydrogen produced or resulting from sources other than fossil fuels, biomass, solar energy, geothermal energy, wind energy, ocean energy, and hydroelectric power.

Although not considered a traditional renewable resource, some industrial plants take advantage of waste heat, produced in production processes to provide electrical power via cogeneration. Phosphate fertilizer plants, which produce large amounts of heat in the manufacturing of phosphate from the input stocks of sulfuric acid, are a notable example of this type of renewable resource. Section 366.91(2)(e), F.S., includes the following language which recognizes the aforementioned cogeneration process:

The term [Renewable Energy] includes the alternative energy resource, waste heat, from sulfuric acid manufacturing operations and electrical energy produced using pipeline-quality synthetic gas produced from waste petroleum coke with carbon capture and sequestration.

Existing Renewable Resources

Currently, renewable energy facilities provide approximately 14,723 MW of firm and non-firm generation capacity, which represents 20 percent of Florida’s overall generation capacity of 73,500 MW in 2024. Table 6 summarizes the contribution by renewable type of Florida’s existing renewable energy sources.

Table 6: State of Florida - Existing Renewable Resources

Renewable Type	MW	% Total
Solar	13,311	90.4%
Municipal Solid Waste	473	3.2%
Biomass	380	2.6%
Waste Heat	173	1.2%
Wind	272	1.8%
Landfill Gas	64	0.4%
Hydroelectric	51	0.3%
Renewable Total	14,723	

Source: FRCC 2025 Regional Load and Resource Plan and TYSP Utilities’ Data Responses

Of the total 14,723 MW of renewable generation, approximately 5,145 MW are considered firm, based on either operational characteristics or contractual agreement. Firm renewable generation can be relied on to serve customers and can contribute toward the deferral of new fossil fuel power plants. Solar generation contributes approximately 4,706 MW to this total, based upon the

coincidence of solar generation and summer peak demand, or about 35 percent of its installed capacity. Changes in timing of peak demand may influence the firm contributions of renewable resources such as solar and wind.

Of the 1,412 MW of non-solar generation, only 439 MW is treated as firm because of contractual commitments. The remaining renewable generation can generate energy on an as-available basis or for internal use (self-service). As-available energy is considered non-firm, and cannot be counted on for reliability purposes; however, it can contribute to the avoidance of burning fossil fuels in existing generators. Self-service generation reduces demand on Florida's utilities.

Utility-Owned Renewable Generation

Most renewable generation in Florida is utility-owned, with 9,988 MW of installed capacity, or 67.8 percent of total renewables, consisting primarily of solar facilities. Due to the intermittent nature of solar resources, capacity from these facilities has previously been considered non-firm for planning purposes. However, several utilities are attributing firm capacity contributions to their solar installations based on the coincidence of solar generation and summer peak demand. Of the approximately 9,831 MW of existing utility-owned solar capacity, approximately 4,485 MW, or about 45.6 percent, is considered firm. All other renewable sources account for an additional 157 MW of utility-owned generation, which are all considered firm.

Non-Utility Renewable Generation

Approximately 1,934 MW, or 13.1 percent, of Florida's existing renewable capacity comes from non-utility generators such as cogeneration facilities and renewable energy power plants with a capacity no greater than 80 MW (collectively referred to as Qualifying Facilities or QFs). In 1978, the U.S. Congress enacted the Public Utility Regulatory Policies Act (PURPA), which requires utilities to purchase electricity from QFs at the utility's full avoided cost. These costs are defined in Section 366.051, F.S., which provides, in part, that:

A utility's "full avoided costs" are the incremental costs to the utility of the electric energy or capacity, or both, which, but for the purchase from cogenerators or small power producers, such utility would generate itself or purchase from another source.

If a renewable energy generator meets specified deliverability requirements, its capacity and energy output can be compensated under a firm contract. Rule 25-17.250, F.A.C., requires each investor-owned utility to establish a standard offer contract with timing and rate of payments based on each fossil-fueled generating unit type identified in the utility's TYSP. In order to promote renewable energy generation, the Commission requires the investor-owned utilities to offer multiple options for capacity payments, including the options to receive early (prior to the in-service date of the avoided-unit) or levelized payments. The different payment options allow renewable energy providers the option to select the payment option that best fits their financing requirements, and provides a basis from which negotiated contracts can be developed.

As previously discussed, large amounts of renewable energy is generated on an as-available basis. As-available energy is energy produced and sold by a renewable energy generator on an hour-by-hour basis for which contractual commitments as to the quantity and time of delivery are not

required. As-available energy is purchased at a rate equal to the utility’s hourly incremental system fuel cost, which reflects the highest fuel cost of generation each hour.

Customer-Owned Renewable Generation

Approximately 2,794 MW, or 19.0 percent, of renewable capacity is from small customer-owned renewable systems. As of the end of 2024, over 292,284 systems have been installed statewide. With respect to customer-owned renewable generation, Rule 25-6.065, F.A.C., requires the IOUs to offer net metering for all types of renewable generation up to 2 MW in capacity and a standard interconnection agreement with an expedited interconnection process. Net metering allows a customer with renewable generation capability, to offset their energy usage. Table 7 summarizes the growth of customer-owned renewable generation interconnections. Almost all installations are solar. Non-solar generation, which accounts for only 25 installations and 7.1 MW of installed capacity includes wind turbines and anaerobic digesters.

Table 7: State of Florida - Customer-Owned Renewable Growth

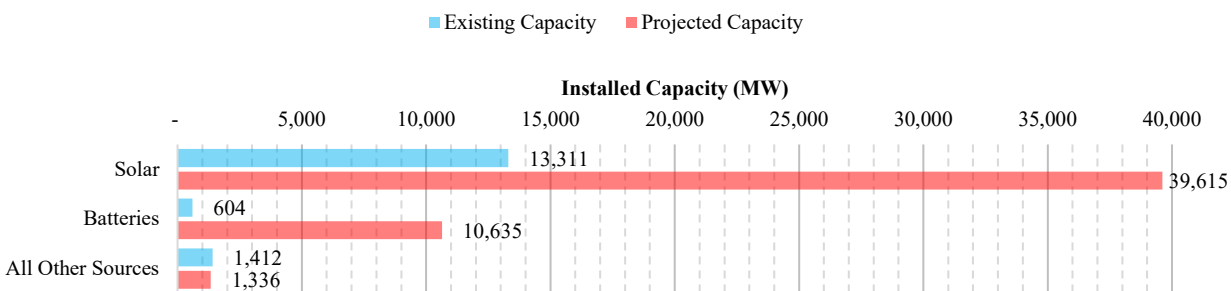
Year	2018	2019	2020	2021	2022	2023	2024
Number of Installations	37,862	59,508	90,552	130,947	189,952	249,521	292,284
Installed Capacity (MW)	317	514	835	1,177	1,780	2,351	2,801

Source: 2018-2024 Net Metering Reports

Planned Renewable Resources

Florida’s total renewable resources are expected to increase by an estimated 26,228 MW over the 10-year planning period, a decrease from last year’s estimated 30,737 MW projection. Solar generation, primarily utility-owned, is the sole renewable type projected to increase over the planning horizon, with non-solar renewables decreasing by 76 MW due to retirements or expired contracts. While solar generation is covered under the Florida Electrical Power Plant Siting Act, all future solar projects are below the 75 MW threshold, and therefore are not required to seek approval from the Commission prior to construction. Figure 11 summarizes the existing and projected renewable capacity by generation type as well as energy storage capacity in the form of batteries.

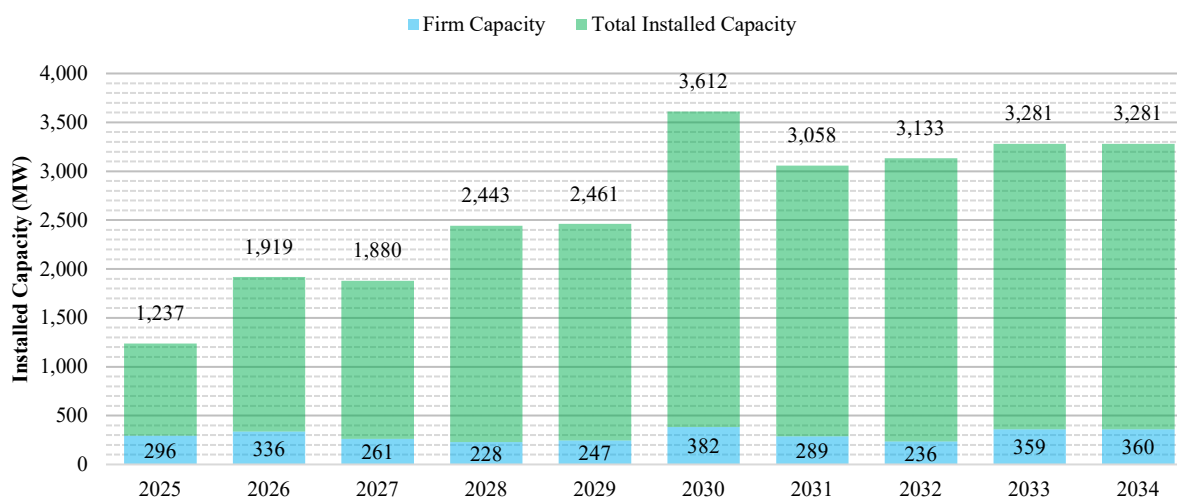
Figure 11: State of Florida – Current and Projected Renewables and Energy Storage



Source: FRCC 2025 Regional Load and Resource Plan and TYSP Utilities’ Data Responses

As noted previously, solar generation is anticipated to increase significantly over the 10-year period, with a net total of 26,304 MW to be installed, excluding solar degradation. This consists of 23,311 MW of utility-owned solar and 2,993 MW of contracted solar. The firm contribution of solar varies by utility, with some having a set percentage value for all projects over the planning period, and others having a declining value as projects are added. A total of 3,032 MW of solar additions are considered firm for summer peak, or about 11.4 percent of the total installed. Figure 12 provides an overview of the additional solar capacity generation planned within the next 10 years, as well as the amount considered firm for summer reserve margin planning.

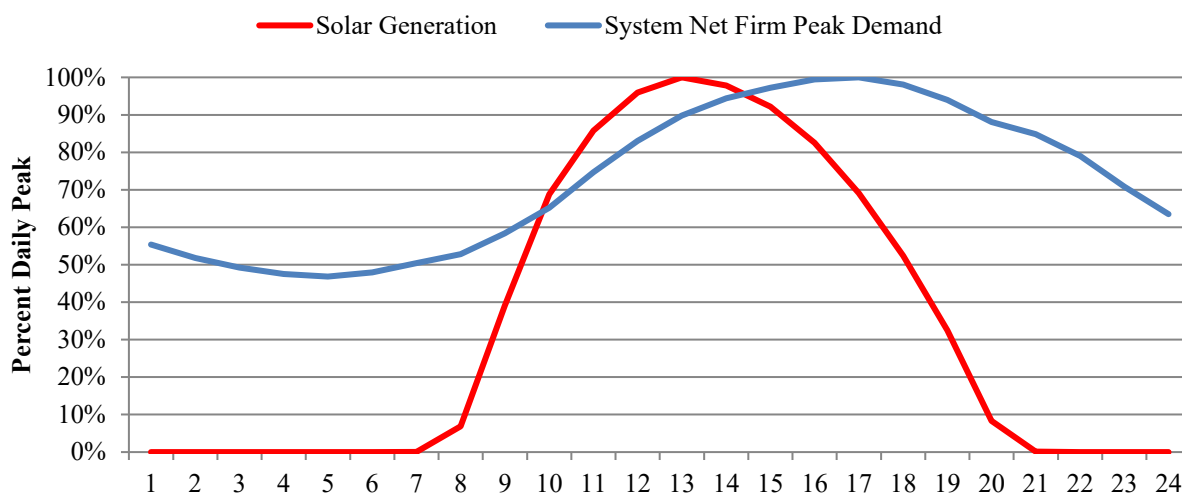
Figure 12: TYSP Utilities - Planned Solar Installations



Source: FRCC 2025 Regional Load and Resource Plan and TYSP Utilities' Data Responses

As the amount of solar increases in the state, the difference in how it operates compared with traditional generation will become increasingly important to the grid. Solar generation cannot be dispatched on demand; instead, it is produced based on conditions at the plant site, which are influenced by variations in daylight hours, cloud cover, and other environmental factors. Generally speaking, the peak hours for production of a solar facility are closer to noon, whereas the peak in system demand tends to be in the early evening in summer and early morning in winter. Figure 13 illustrates this with example data from FPL's 2023 TYSP hourly dispatch model for their 2024 summer peak day. While solar generation peaks at 1:00 p.m., the net firm system demand peaks at 5:00 p.m. when solar generation is only at 69 percent of its daily peak. By 6:00 p.m., demand remains high, at 98 percent of its daily peak, while solar generation falls to 52 percent. Energy storage and other technologies to shift load, such as DSM programs or demand response, can be used to offset these characteristics.

Figure 13: FPL 2024 Summer Peak Day Hourly Dispatch



Source: 2023 FPL Data Response

Energy Storage

In addition to a number of electric grid-related applications, emerging energy storage technologies have the potential to considerably increase not only the firm capacity contributions from solar PV installations, but their overall functionality as well. Energy storage technologies that are currently under research include pumped hydropower, flywheels, compressed air, thermal storage, and battery storage. Of these technologies, battery storage is primarily planned and used by utility companies. Battery storage has been proposed for connection directly to the grid, behind the meter box (net metering) or integrated with a solar/PV unit. Battery storage technology has continued to advance, and the cost of storage is projected to continue to decline over the long-term, aided, in part, by continued tax credits from the Inflation Reduction Act.

Florida's utilities have engaged in small pilot programs to determine the best placement and usage for energy storage technologies, including behind the customer's meter, at distribution substations, and at generating facilities. Each use case has its own benefits, allowing customers to ride out outages (net metering), improving reliability and reducing line losses (distribution substations), or providing firm capacity to the grid (generating facilities). Currently, the TYSP Utilities have 604 MW of installed battery energy storage, with the single largest installation being FPL's 409 MW Manatee battery storage site. Battery storage is a unique resource in that it can contribute to firm capacity and offers a fast ramp rate, but it has a limited duration and requires charging from the grid, becoming a load to be served rather than generation serving load. Due to small inefficiencies in charging and discharging, batteries actually increase the total amount of energy that utilities must produce to serve customer load — affecting net load rather than net generation.

Over the next decade, utilities anticipate adding approximately 10,031 MW of energy storage, primarily directly on the transmission system or a specific power plant. While energy storage provides firming for intermittent solar facilities, grid connected batteries will not be restricted to charging from renewable sources. These units can be charged from any energy source during off-peak periods, including fossil fuel generation. To the extent solar generation is charging batteries

it is also not offsetting fossil fuel generation that otherwise would be occurring on the grid during the same period. Some energy storage will be directly connected to a specific renewable power plant. Given these characteristics, for reliability planning purposes, 548 MW of existing battery storage and 5,673 MW for planned battery storage is considered firm for summer peaks.

Companies are continuing to explore different forms of energy storage even as they expand their construction of battery storage, such as storage with longer duration or superior ability to address operational needs. The Commission will continue to monitor technological developments in energy storage to cost-effectively address the state's fuel diversity, reducing the dependence on fossil fuels, while still maintaining adequate resources to provide for customer loads.

Traditional Generation

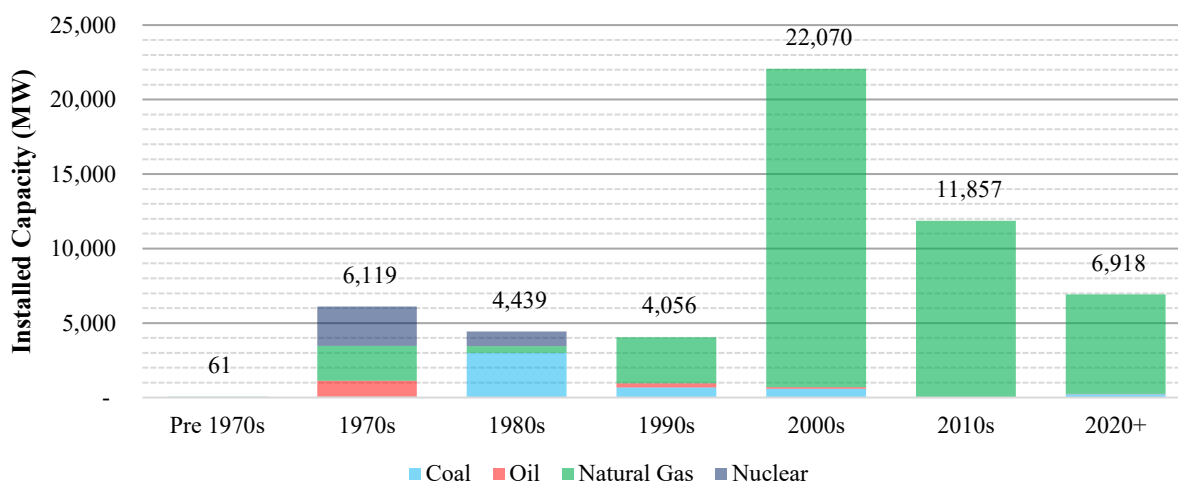
While renewable generation increases its contribution to the state's generating capacity, a majority of generation is projected to come from traditional sources, such as fossil-fueled steam and combustion turbine generators that have been added to Florida's electric grid over the last several decades. Due to forecasted increases in peak demand, further traditional resources are anticipated over the planning period.

Florida's electric utilities have historically relied upon several different fuel types to serve customer load. Previous to the oil embargo, Florida used oil-fired generation as its primary source of electricity until the increase in oil prices made this undesirable. Since that time, Florida's electric utilities have sought a variety of other fuel sources to diversify the state's generation fleet and more reliably and cost-effectively serve customers. Numerous factors, including swings in fuel prices, availability, environmental concerns, and other factors have resulted in a variety of fuels powering Florida's electric grid. Solid fuels, such as coal and nuclear, increased during the shift away from oil-fired generation, and more recently natural gas has emerged as the dominant fuel type in Florida.

Existing Generation

Florida's generating fleet includes incremental new additions to a historic base fleet, with units retiring as they become uneconomical to operate or maintain. Currently, Florida's existing capacity ranges greatly in age and fuel type, and legacy investments continue. The weighted average age of Florida's traditional generating units is 22 years. While the original commercial in-service date may be in excess of 50 years for some units, they are constantly maintained as necessary in order to ensure safe and reliable operation, including uprates from existing capacity, which may have been added after the original in-service date. Figure 14 illustrates the decade in which current operating generating capacity was originally added to the grid, with the largest additions occurring in the 2000s.

Figure 14: State of Florida - Electric Utility Installed Capacity by Decade



Source: FRCC 2025 Regional Load and Resource Plan

The existing generating fleet will be impacted by several events over the planning period. New and proposed environmental regulations may require changes in unit dispatch, fuel switching, or installation of pollution control equipment which may reduce net capacity. Modernizations will allow more efficient resources to replace older generation, while potentially reusing power plant assets such as transmission and other facilities, switching to more economic fuel types, or implementing uprates at existing facilities to improve power output. Lastly, retirements of units which can no longer be operated and maintained economically or that fail to meet environmental requirements will reduce existing generation.

Impact of the EPA Rules

Over the summer, the EPA has issued three proposed rules that, if finalized and implemented as proposed, would significantly change the current environmental regulatory landscape affecting energy generation.

On June 11, 2025, the EPA Administrator announced a proposal to repeal all greenhouse gas (GHG) emission standards for electric generating units (EGUs) under Section 111 of the Clean Air Act. The EPA argues that GHG emissions from these facilities do not contribute significantly to dangerous air pollution.

Also on June 11, 2025, the EPA announced a proposal to repeal amendments to the 2024 Mercury and Air Toxics Standards that directly result in coal-fired power plants shutting down. The MATS Proposed Rule seeks to repeal recent amendments that tightened filterable particulate matter emission standards and mercury emission standards for certain existing coal-fired EGUs that use lignite, instead of bituminous coal. There are no lignite coal-firing units in Florida at this time. This proposal would reverse three key regulatory changes: the stricter filterable particulate matter emission standard for existing coal-fired EGUs, the more restrictive compliance demonstration requirements that limited monitoring options to only particulate matter continuous emission monitoring systems, and the tightened mercury emission standard for lignite-fired EGUs.

On July 29, 2025, the EPA issued a proposal to rescind the 2009 Endangerment Finding, which would have sweeping effects on GHG regulations for the transportation sector. If finalized, the proposal would repeal all GHG emission regulations for motor vehicles and engines. The Endangerment Finding Proposed Rule could also undermine the legal basis for GHG regulations across the power sector.

Modernization and Efficiency Improvements

Modernizations involve removing existing generator units that may no longer be economical to operate, such as oil-fired steam units, and reusing the power plant site's transmission or fuel handling facilities with a new set of generating units. The modernization of existing plant sites, allows for significant improvement in both performance and emissions, typically at a lower price than new construction at a greenfield site. Not all sites are candidates for modernization due to site layout and other concerns, and to minimize rate impacts, modernization of existing units should be considered along with new construction at greenfield sites.

Several utilities have converted oil-fired and coal-fired steam units to natural gas-fired combined cycle units, or converted or upgraded them to run on natural gas for all or a majority of their fuel.

This trend continues, with direct coal-fired steam to natural gas-fired steam, such as OUC's conversion of Stanton Unit 2 by 2027. Additional planned conversions from coal or other solid fuels are planned by the TYSP Utilities, including TECO's conversion of the Polk Unit 1 integrated gasification combined cycle unit, the only petcoke fueled combined cycle within the state, to a natural gas-fired combustion turbine in 2025.

Utilities also plan several efficiency improvements to existing generating units. For example, the conversion of existing simple cycle combustion turbines into a combined cycle unit, which captures the waste heat and uses it to generate additional electricity using a steam turbine. Overall, 490 MW of additional summer firm capacity is from upgrades to existing natural gas fired combined cycle units. In addition, DEF and OUC plan transmission upgrades that will allow them improved access to capacity from existing natural gas units at the Osprey and Osceola plant sites in 2025. While these do not change the amount of capacity available in the state as a whole, it improves the ability to deliver capacity where needed on the system.

Utilities are also investigating potential future conversions or dual-firing with hydrogen. For example, FPL's hydrogen pilot at its Okeechobee natural gas-fired combined cycle facility, approved as part of FPL's 2021 Settlement Agreement, involves using a solar powered electrolyzer to produce hydrogen from water and replacing up to 5 percent of the fuel mix with hydrogen in the unit's combustion turbines.⁷

Planned Retirements

Power plant retirements occur when the electric utility is unable to economically operate or maintain a generating unit due to environmental, economic, or technical concerns. Table 8 lists the 3,848 MW of existing generation that is scheduled to be retired during the planning period. A majority of the retirements are coal-fired steam generators, with four units totaling 2,067 MW of capacity to be retired by 2034, followed by oil combustion turbines, with five units totaling 753 MW by 2034, and natural gas-fired steam generation, with four units totaling 750 MW of capacity to be retired by 2030.

⁷ Order No. PSC-2021-0446-S-EI, issued December 2, 2021, in Docket No. 20210015-EI, *In re: Petition for rate increase by Florida Power & Light Company*.

Table 8: State of Florida - Electric Generating Units to be Retired

Year	Utility	Plant Name	Net Capacity
	Name	& Unit Number	(Sum MW)
Coal Steam Retirements			
2025	FMPA/OUC	Stanton Energy Center Unit 1	451
2034	FPL	Scherer Unit 3	215
2034	DEF	Crystal River 4 & 5	1,422
		Subtotal	2,067
Oil Combustion Turbine Retirements			
2026	DEF	Bayboro Units P1-P4	137
2027	DEF	Debary Units P2-P6	227
2027	DEF	Bartow Units P1 & P3	82
2028	FPL	Lansing Smith Unit 3A	32
2034	DEF	Intercession City P1-P6	275
		Subtotal	753
Natural Gas Steam Retirements			
2027	GRU	Deerhaven Unit FS01	76
2029	FPL	Gulf Clean Energy Center 4 & 5	150
2030	JEA	Northside Unit 3	524
		Subtotal	750
Natural Gas Combustion Turbine Retirements			
2026	FPL	Pea Ridge 1-3	12
2031	GRU	Deerhaven Unit GT1 & GT2	35
2034	DEF	Bartow Units P2 & P4	86
2034	DEF	Suwannee P1-P3	145
		Subtotal	278
Total Retirements			3,848

Source: 2025 TYSPs

Reliability Requirements

Florida's electric utilities are expected to have enough generating assets available at the time of peak demand to meet forecasted customer demand. If utilities only had sufficient generating capacity to meet forecasted peak demand, then potential instabilities could occur if customer demand exceeds the forecast, or if generating units are unavailable due to maintenance or forced outages. To address these circumstances, utilities are required to maintain additional planned generating capacity above the forecasted customer demand.

Reserve Margin

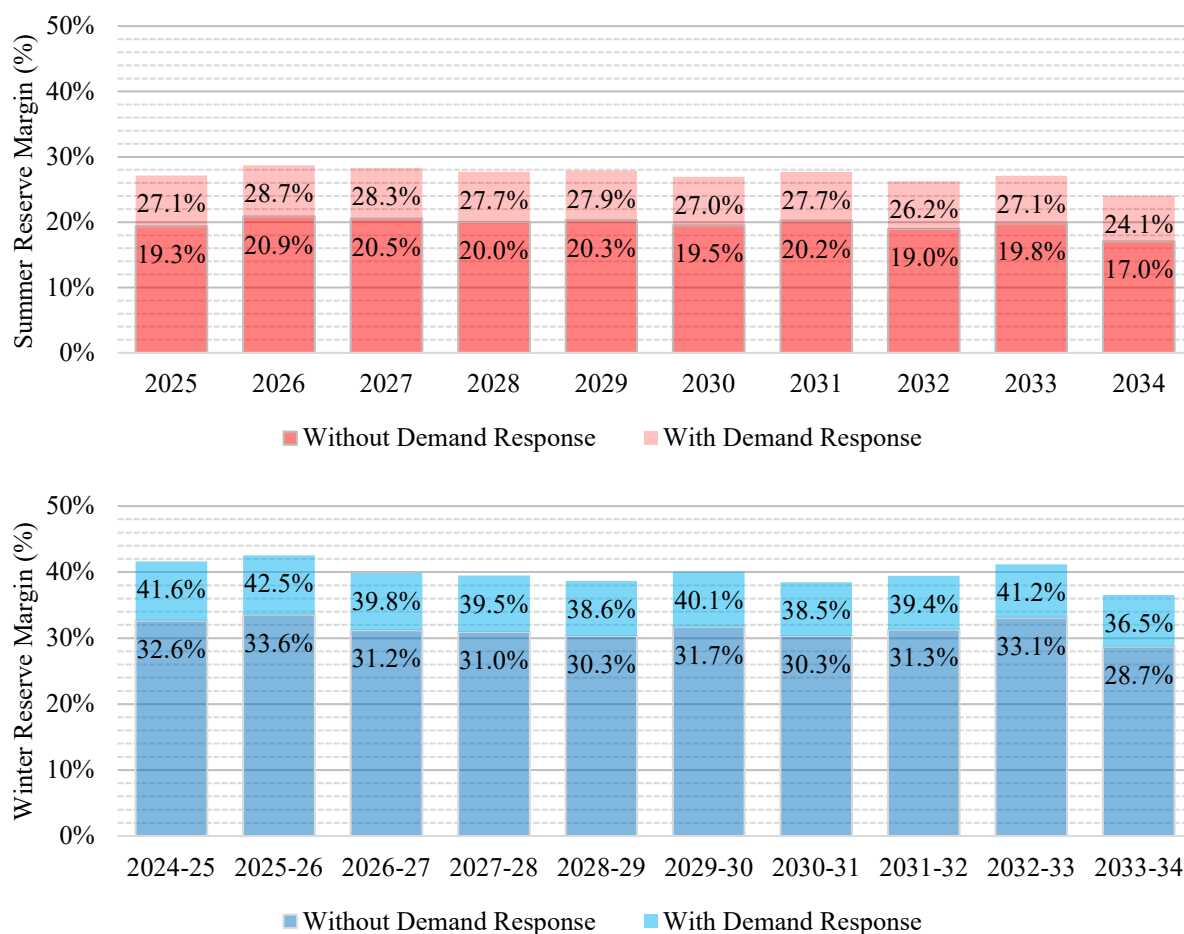
One reliability metric commonly used by the TYSP Utilities is a seasonal planning reserve margin. Each utility annually compares their forecasted seasonal peak demand after activation of demand response resources with the total amount of firm generation available at the seasonal peak hour. The difference between these values is the reserve margin, which is expressed in both megawatts and as a percentage of the net firm peak demand. Pursuant to Rule 25-6.035, F.A.C., electric utilities within Florida must maintain a minimum reserve margin of 15 percent for planning purposes, although certain utilities have elected to use a higher planning reserve margin, either on an annual or seasonal basis. The three largest reporting electric utilities, FPL, DEF, and TECO,

are party to a stipulation approved by the Commission that utilizes a 20 percent reserve margin for planning.⁸ As a whole, Florida typically has a lower summer reserve margin than winter, but individual utilities may be more impacted by winter peaks.

Regarding demand response, while participants receive discounted rates or credits paid for by all ratepayers regardless of activation, the concern exists that as activations increase, participation could decrease. While large interruptible customers typically have notice period requirements, small load management customers usually do not have an advanced notice requirement. Historically, activations of demand response have almost exclusively been of the smaller load management customers, and typically for off-peak periods. As illustrated in Figure 15, the statewide seasonal reserve margin exceeds the FRCC's required 15 percent planning reserve margin in all years. Even without demand response, the statewide reserve margin is anticipated to remain 17 percent or above throughout the planning period. On average, demand response contributes 7.5 percent toward the summer reserve margin, and 8.4 percent toward the winter reserve margin.

⁸ Order No. PSC-99-2507-S-EU, issued December 22, 1999, in Docket No. 19981890-EU, *In re: Generic investigation into the aggregate electric utility reserve margins planned for Peninsular Florida*.

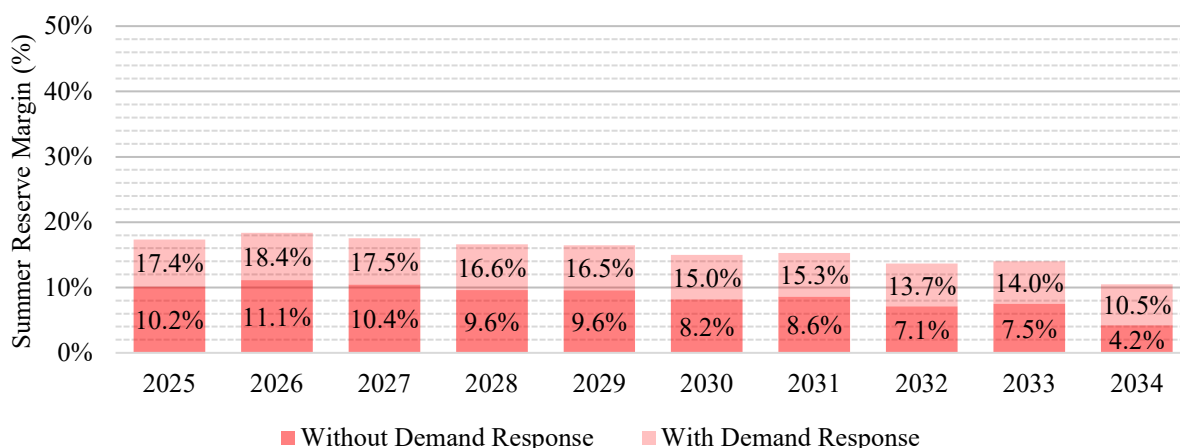
Figure 15: State of Florida - Projected Reserve Margin by Season



Source: FRCC 2025 Regional Load and Resource Plan - Revised Form 10

As discussed above, the reserve margin calculation is based upon the hour of highest peak demand and compared to the available firm generation. With the increase in the amount of non-dispatchable generation, primarily solar, the highest peak hour may no longer represent the time of highest dispatchable generation need especially for the summer peak period. One potential approach to address this would be to evaluate a net-solar peak hour, treating solar as a reduction to load similar to demand response. Alternatively, the firm contribution of solar could be removed from the reserve margin analysis to determine the contribution only of dispatchable resources, such as demand response or traditional generation. On average, solar contributes approximately 11.7 percent towards the summer reserve margin over the planning period. As illustrated by Figure 16, even without any contribution from solar at time of system peak, the statewide reserve margin would remain above the 15 percent threshold until 2032.

Figure 16: State of Florida - Projected Summer Reserve Margin without Solar



Source: FRCC 2025 Load & Resource Plan, 2025 TYSP Data Responses

Loss of Load Probability

In addition to reserve margin, Florida's utilities have used multiple indices to determine the reliability of their electric supplies. An additional metric is the Loss of Load Probability (LOLP), which is a probabilistic assessment of the duration of time electric customer demand will exceed electric supply, and is measured in units of days per year. A maximum LOLP of no more than 0.1 days per year, or approximately 1 day of outage per 10 years is a frequently used metric. Between the two reliability indices, LOLP and reserve margin, the reserve margin requirement has typically been the controlling factor for the addition of capacity for several decades.

Similar to reserve margin, with an increase in non-dispatchable generation, a LOLP analysis that looks at all days or hours of the year provides additional information regarding the reliability of the system. Based on the 2025 Load and Resource Reliability Assessment Report, the FRCC details how it conducted a statewide LOLP analysis for the period 2025 through 2029 using a system planning model that considered all hours of the year, using probabilistic methods to simulate various weather and unit outages, producing several thousand scenarios, and performing sensitivities with no imports, no demand response activations, and high load conditions. Overall, in the base case and in each sensitivity the FRCC determined that the planned resources are more than adequate to meet the 0.1 LOLP requirement by at least three orders of magnitude in the base case, and two orders of magnitude for the highest sensitivity. The results of the scenarios are provided in Table 9.

Table 9: FRCC Loss of Load Probability Study Results

Year	Scenario Results (Days/Year)			
	Base Case	No Availability of Imports	No Availability of Demand Response	High Load Case
2025	0.0001844	0.0003500	0.0007738	0.0010250
2026	0.0000514	0.0000318	0.0003046	0.0003964
2027	0.0000153	0.0000132	0.0001546	0.0002870
2028	0.0001177	0.0001135	0.0004745	0.0010767
2029	0.0002925	0.0002562	0.0014651	0.0028279

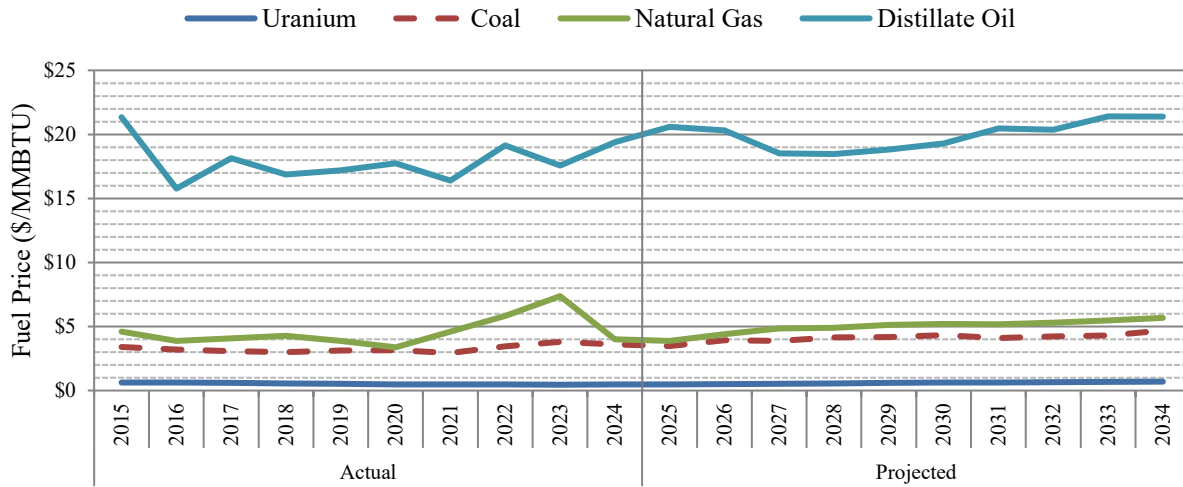
Source: 2025 TYSP Workshop FRCC Studies and Reports

Fuel Price Forecast

Fuel price is an important economic factor affecting the dispatch of the existing generating fleet and the selection of new generating units. In general, the capital cost of a fuel-based power plant is inversely proportional to the cost of the fuel used to generate electricity from that unit. The major fuels consumed by Florida's electric utilities are natural gas, uranium, and coal. Natural gas remains the most widely used fuel statewide, projected to account for between 73.2 percent and 58.0 percent of electric generation (in GWh) from 2025 through 2034.

As shown on Figure 17, the forecasted weighted average price per million British Thermal Units (MMBTUs) for natural gas, uranium, and coal are all expected to increase over the next 10 years. The highest forecasted increase in price over the forecast horizon is for natural gas, which is expected to increase from \$3.98 per MMBTU to \$6.10 per MMBTU by 2034. Meanwhile uranium, easily the lowest price fuel of the three, is projected to increase in price from \$0.51 MMBTU to \$0.75 MMBTU. Coal is projected to increase in price from \$3.29 MMBTU to \$4.78 MMBTU. Distillate oil is the most expensive fuel, with forecasted prices ranging between \$17.43 and \$21.24 per MMBTU from 2025 through 2034. Its high cost helps explain why it is used primarily for backup and peaking purposes.

Figure 17: TYSP Utilities - Average Fuel Price of Reporting Electric Utilities

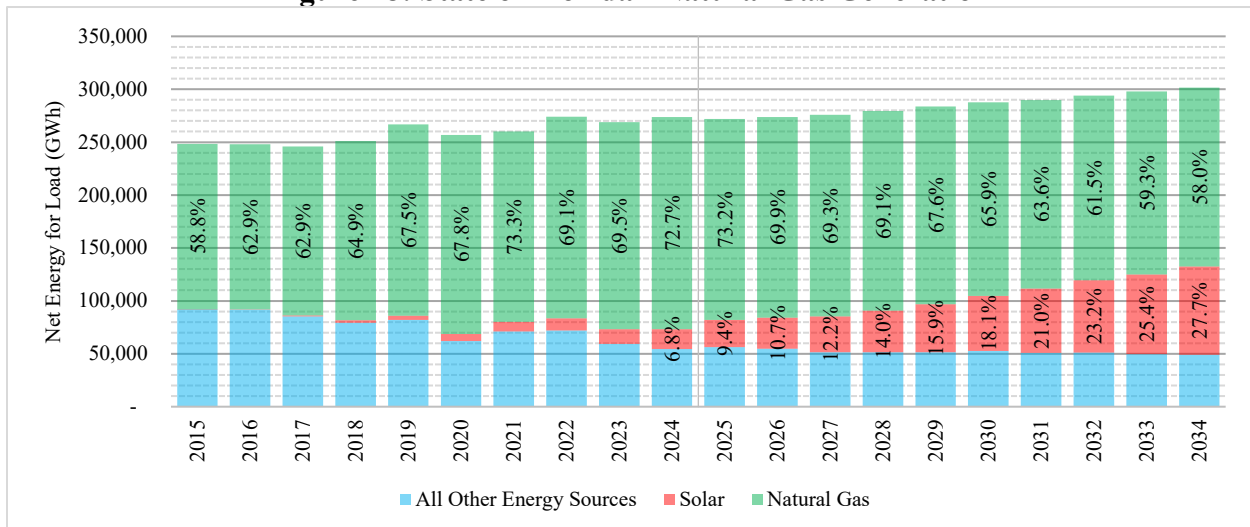


Source: TYSP Utilities' Data Responses

Fuel Diversity

Natural gas has risen to become the dominant fuel in Florida and since 2011 has generated more net energy for load than all other fuels combined. As Figure 18 illustrates, natural gas was the source of approximately 72.7 percent of electric energy consumed in Florida in 2024. Natural gas electric generation, as a percent of net energy for load, is anticipated to decline throughout the remainder of the planning period, offset by solar generation. Solar generation is anticipated to exceed all non-natural gas energy sources combined by 2031.

Figure 18: State of Florida - Natural Gas Generation

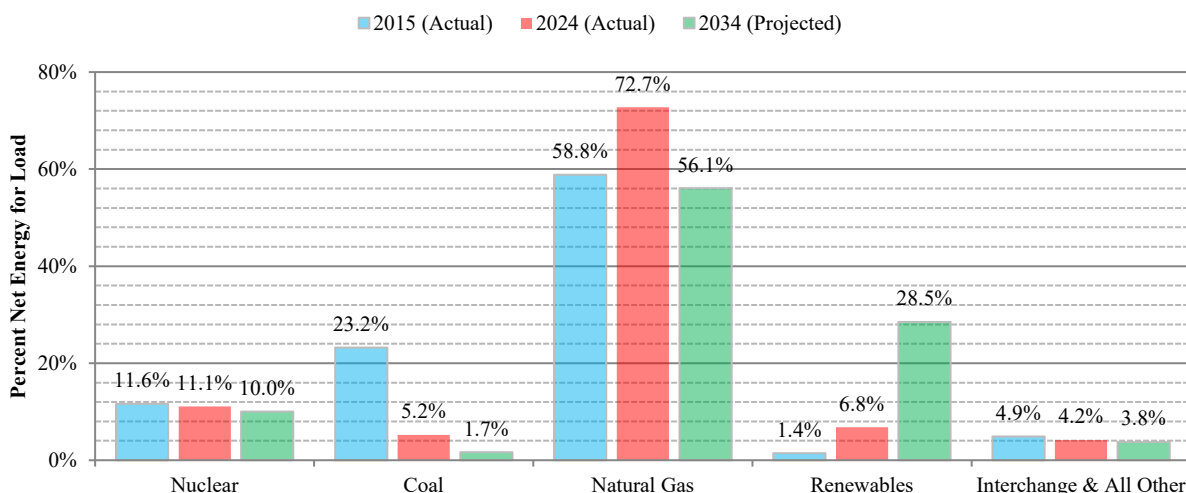


Source: FRCC 2015-2034 Regional Load and Resource Plans

Because a balanced fuel supply can enhance system reliability and mitigate the effects of volatility in fuel price fluctuations, it is important that utilities have a level of flexibility in their generation mix. Maintaining fuel diversity on Florida's system faces several difficulties. Existing coal units will require additional emissions control equipment leading to reduced output, or retirement if the emissions controls are uneconomic to install or operate. New solid fuel generating units such as nuclear and coal have long lead times and high capital costs. New coal units face challenges related to environmental compliance requirements, making it unlikely that they could be permitted without novel emissions control technologies.

Figure 19 shows Florida's historic and forecast percent net energy for load by fuel type for the actual years 2015 and 2024, and forecast year 2034. Nuclear generation is expected to remain steady throughout the planning period. Coal generation is expected to continue its downward trend well into the planning period. Natural gas has been the primary fuel used to meet the growth of energy consumption, but this trend is anticipated to slightly decrease during the planning period. Renewables are expected to exceed all other generation sources except for natural gas by 2030.

Figure 19: State of Florida - Historic and Forecast Generation by Fuel Type



Source: FRCC 2015-2034 Regional Load and Resource Plan

Based on 2023 U.S. Energy Information Administration data, Florida ranks fifth in terms of the total volume of natural gas consumed compared to the rest of the United States, representing 5 percent of national gas consumption.⁹ For volume of natural gas consumed for electric generation, Florida ranks second, behind Texas, representing 10.9 percent of national gas consumption for electric generation. Approximately 86.0 percent of natural gas consumed in Florida was for electric generation in 2023. Natural gas is not used as a heating fuel in most of Florida's homes and businesses, which rely instead upon electricity that is increasingly being generated by natural gas. As Florida has very little natural gas production and limited gas storage capacity, the state is reliant upon out-of-state production and storage to satisfy the growing electric demands of the state.

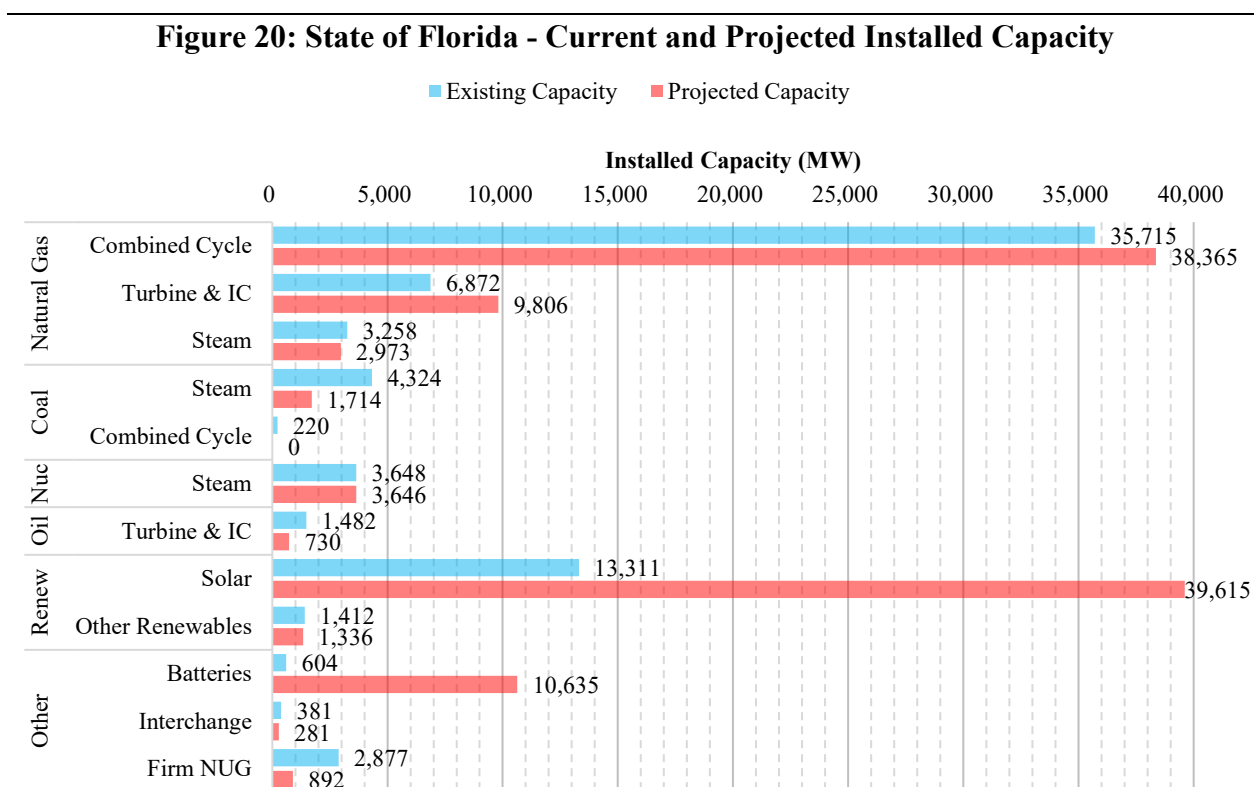
⁹ U.S. Energy Information Administration Natural Gas Annual Report.

New Generation Planned

Current demand and energy forecasts continue to indicate that in spite of increased levels of conservation, energy efficiency, renewable generation, and existing traditional generation resources, the need for additional generating capacity still exists. While reductions in demand have been significant, the total demand for electricity is expected to increase, making the addition of traditional generating units necessary to satisfy reliability requirements and provide sufficient electric energy to Florida's consumers. Because any capacity addition has certain economic impacts based on the capital required for the project, and due to increasing environmental concerns relating to solid fuel-fired generating units, Florida's utilities must carefully weigh the factors involved in selecting a supply-side resource for future traditional generation projects.

In addition to traditional economic analyses, utilities also consider several strategic factors, such as fuel availability, generation mix, and environmental compliance prior to selecting a new supply-side resource. Limited supplies, access to water or rail delivery points, pipeline capacity, water supply and consumption, land area limitations, cost of environmental controls, and fluctuating fuel costs are all important considerations to the utilities' IRP process.

Figure 20 illustrates the present and future aggregate capacity mix. The capacity values in Figure 20 incorporate all proposed additions, retirements, fuel switching, uprates and derates, and changes in operational or contract status contained in the reporting utilities' 2025 TYSPs and the FRCC's 2025 Regional Load and Resource Plan.



Source: FRCC 2025 Regional Load and Resource Plan and TYSP Utilities' Data Responses

Commission's Authority Over Siting

Any proposed steam or solar generating unit greater than 75 MW requires a certification under the Florida Electrical Power Plant Siting Act (PPSA), contained in Sections 403.501 through 403.518, F.S. The Commission has exclusive jurisdiction to determine the need for new electric power plants through Section 403.519, F.S. Upon receipt of a determination of need, the electric utility would then seek approval from the Florida Department of Environmental Protection, which addresses land use and environmental concerns. When all parties stipulate that there are no disputed issues of material fact or law involved, the applicant may request that the Secretary of the Florida Department of Environmental Protection approve or deny certification, pursuant to Sections 403.508(6)(a) and 403.509(1)(a), F.S. Otherwise, the Governor and Cabinet sitting as the Siting Board ultimately must approve or deny the overall certification of a proposed line when there is a disputed issue of material fact or law, pursuant to Section 403.509(1)(b), F.S. There are only two planned units, both natural gas-fired combined cycles, requiring certification under the PPSA: a 576 MW unit with an in-service date of 2030 for JEA, and a 559 MW unit with an in-service date of 2032 for SEC. Based on these in-service dates, petitions are anticipated in 2026 and 2028 for JEA and SEC, respectively.

New Power Plants by Fuel Type

Nuclear

Nuclear capacity, while an alternative to natural gas-fired generation, is capital-intensive and requires a long lead time to construct. In April 2018, FPL received Combined Operating Licenses from the Nuclear Regulatory Commission for two future nuclear units, Turkey Point Units 6 and 7. These units are planned to be sited at FPL's Turkey Point site, the location of two existing nuclear generating units. The earliest possible in service date for these two units are outside the scope of the TYSP.

Florida is proactively exploring Small Modular Reactors (SMRs) to meet rising energy demands, though no units are currently operating. The state's efforts include a March 2025 feasibility report from the Commission and a related lawsuit filed by the Florida Attorney General against the U.S. Nuclear Regulatory Commission in April 2025. Major utilities like FPL and DEF are also considering SMR technology for their long-term power generation plans. In addition, the March 2025 feasibility report looked into military installations in partnership with a public utility.

Natural Gas

Several new natural gas-fired combustion turbines, internal combustion units, and combined cycle units are planned over the next 10 years. While combined cycle systems are the dominant generating unit type, combustion turbines that run only in simple cycle mode and internal combustion units (also called reciprocating engines), taken together, represent the third most abundant type of generating capacity, behind installed solar generation as well. As combustion turbines and internal combustion units are not a form of steam generation, unless part of a combined cycle unit, they do not require siting under the PPSA. Table 10 summarizes the approximately 4,233 MW of additional capacity from new natural gas-fired generating units proposed by the 2025 TYSP Utilities.

Table 10: TYSP Utilities - Planned Natural Gas Units

In-Service Year	Utility Name	Plant Name & Unit Number	Unit Type	Net Capacity (MW)	Notes
PPSA Approved Units					
2026	SEC	Shady Hills Energy Center Unit 1	CC	546	Docket No. 20170267-EI
Subtotal				546	
New Units Requiring PPSA Approval					
2030	JEA	Advanced Class 1x1 CC	CC	576	
2032	SEC	Unnamed CC	CC	559	
Subtotal				1,135	
New Units Not Requiring PPSA Approval					
2025	TECO	South Tampa Resiliency Project	IC	75	4 Units
2025	LAK	Mcintosh Units MREP 1-3	IC	60	3 Units
2028	SEC	Unnamed CT 1	CT	393	
2030	SEC	Unnamed CT 2	CT	393	
2031	TECO	Future CT 1	CT	222	
2032	FPL	2x0 Manatee CT	CT	469	2 Units
2033	DEF	Undesignated CT 1 & 2	CT	491	2 Units
2034	DEF	Undesignated CT 3 & 4	CT	449	2 Units
Subtotal				2,552	
Total				4,233	

Source: 2025 TYSPs

In addition to the new generation listed in Table 10, multiple utilities are either acquiring existing natural gas-fired merchant generation facilities or are upgrading transmission to allow full capacity benefits from previously purchased resources. These include DEF's Osprey Energy Center (371 MW), FMPA's Orange facility (104 MW), and OUC's Osceola Generation Station (471 MW).

Transmission

As generation capacity increases, the transmission system must grow accordingly to maintain the capability of delivering energy to end-users. The Commission has been given broad authority pursuant to Chapter 366, F.S., to require reliability within Florida's coordinated electric grid and to ensure the planning, development, and maintenance of adequate generation, transmission, and distribution facilities within the state.

The Commission has authority over certain proposed transmission lines under the Florida Electric Transmission Line Siting Act (TLSA), contained in Sections 403.52 through 403.5365, F.S. To require certification under TLSA, a proposed transmission line must meet the following criteria: a nominal voltage rating of at least 230 kV, crossing a county line, and a length of at least 15 miles. Proposed lines in an existing corridor are also exempt from TLSA requirements, pursuant to Section 403.537, F.S. The Commission is the sole forum for determinations of the reliability need and the proposed starting and end points for lines requiring TLSA certification. The proposed corridor route is subsequently determined by the Florida Department of Environmental Protection during the certification process. Much like with the PPSA, when all parties stipulate that there are no disputed issues of material fact or law involved, the applicant may request that the Secretary of the Florida Department of Environmental Protection approve or deny certification, pursuant to Sections 403.527(6)(a) and 403.529(1)(a), F.S. Otherwise, the Governor and Cabinet sitting as the

Siting Board ultimately must approve or deny the overall certification of a proposed line when there is a disputed issue of material fact or law, pursuant to Section 403.529(1)(b), F.S.

The Commission is also monitoring new technologies and trends associated with transmission. The use of advanced conductors that are being designed to operate at higher temperatures with less sag compared to traditional conductors allows for higher current flow and increased transmission line capacity within existing rights-of-way. Using new sensors and control systems with real-time data allows the potential for dynamic line rating systems to assess and adjust the carrying capacity of transmission lines based on loading and weather conditions. Advanced power flow controllers that enable active control and optimization of power flow across the transmission network, potentially reduce congestion, improve system stability, and enhance the integration of renewable energy sources.

Table 11 lists all proposed transmission lines in the 2025 TYSPs and the FRCC 2025 Regional Load and Resource Plan that require TLSA certification. The only planned lines have already received the approval of the Commission.

Table 11: State of Florida - Planned Transmission Lines

Utility	Transmission Line	Line Length	Nominal Voltage	Date Need Approved	Date TLSA Certified	In-Service Date
		(Miles)	(kV)			
FPL	Sweatt to Whidden	79	230	05/2022	09/2022	06/2026
DEF	DeLand West – Dona Vista	26.5	230	07/2025	TBD	01/2030

Source: 2025 TYSPs and FRCC 202 Regional Load and Resource Plan

Utility Perspectives

Florida Power & Light Company (FPL)

FPL is an investor-owned, and Florida's largest, electric utility. FPL's service territory previously was solely in the FRCC Region and consisted of South Florida and the east coast. FPL's parent company, NextEra Energy Inc., acquired Gulf Power Company (GPC) in January 2019. Resource planning is now being done for the single entity of FPL, with the former GPC territory referred to as FPL's Northwest Florida Division (FPL NWFL). As an investor-owned utility, FPL is subject to the regulatory authority of the Commission over all aspects of utility operations, including rates, reliability, and safety. Pursuant to Section 186.801(2), F.S., the Commission finds the FPL 2025 TYSP suitable for planning purposes.

Load and Energy Forecasts

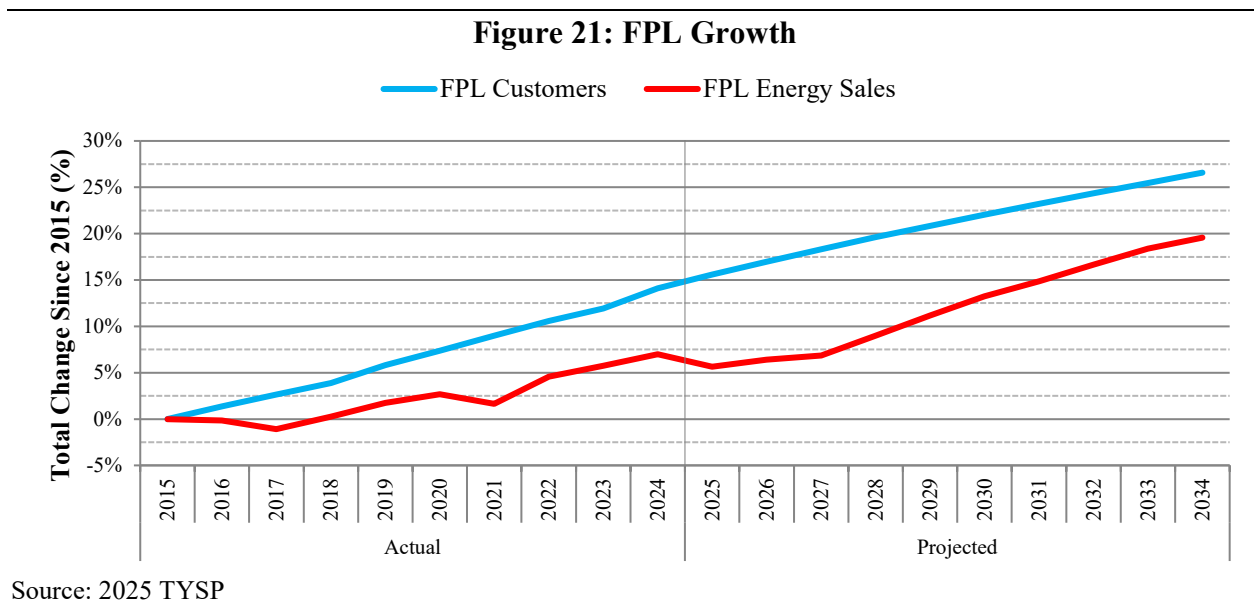
In 2024, FPL's service area had approximately 5,959,750 customers and annual retail energy sales of 129,386 GWh, accounting for approximately 52.6 percent of Florida's annual retail energy sales. The total number of customers and total retail energy sales grew by approximately 2.0 percent and 1.2 percent, respectively, in 2024.

Over the past 10 years, FPL's customer base has increased by 14.1 percent, while retail energy sales have grown by approximately 7.0 percent. For the 2025 TYSP forecast horizon, customers for the FPL system are forecasted to grow by 1.0 percent per year, with the residential and commercial classes accounting for the majority of the increase. According to the Utility, growth is closely linked to Florida's expanding population, housing market, and business activity, all of which are projected to remain positive.

FPL's historical underlying trends affecting average energy UPC across all customer classes include weather variability, economic conditions, and changes in customer behavior or operations. The residential UPC has ranged from relatively flat to slightly increasing in recent years. The change in residential consumption is attributable to the relative increased usage of electronics and equipment within residences, which is offset, in part, by continued improvements in energy efficiency, such as higher efficiency building codes, appliances, lighting, and HVAC systems. The trend in commercial UPC has been relatively flat over the past couple of years. Industrial UPC appeared relatively flat to slow but had a steady decline in the most recent years. The historical decline may be linked to shifts in the local industrial base, customer migration, increased energy efficiency, or operational changes among key industrial customers.

In the forecast period, residential UPC is forecasted to decline gradually over time, primarily driven by continued improvements in energy efficiency, such as higher efficiency building codes, appliances, lighting, and HVAC systems. In addition, increasing customer adoption of energy-saving behaviors and technologies (e.g., smart thermostats, solar panels) is expected to further reduce UPC. The commercial UPC is also expected to be generally flat to slightly declining for similar reasons. Energy efficiency standards, advanced building systems, and retrofits are expected to reduce consumption on a per-customer basis though some commercial customers may see stable or even increasing UPC due to higher operational loads and continued expansion. Industrial UPC is forecasted to increase modestly overall, driven by the expected addition of usage by large load customers.

Over the current TYSP forecast horizon, FPL’s total energy sales to ultimate customers are forecasted to increase steadily, driven primarily by customer growth. Florida’s strong population growth, housing development, and economic expansion continue to be the main drivers of rising energy demand across the state. Figure 21 illustrates historic and prospective forecasted growth rates in customers and retail energy sales for the resource plan that FPL filed in its 2025 TYSP.



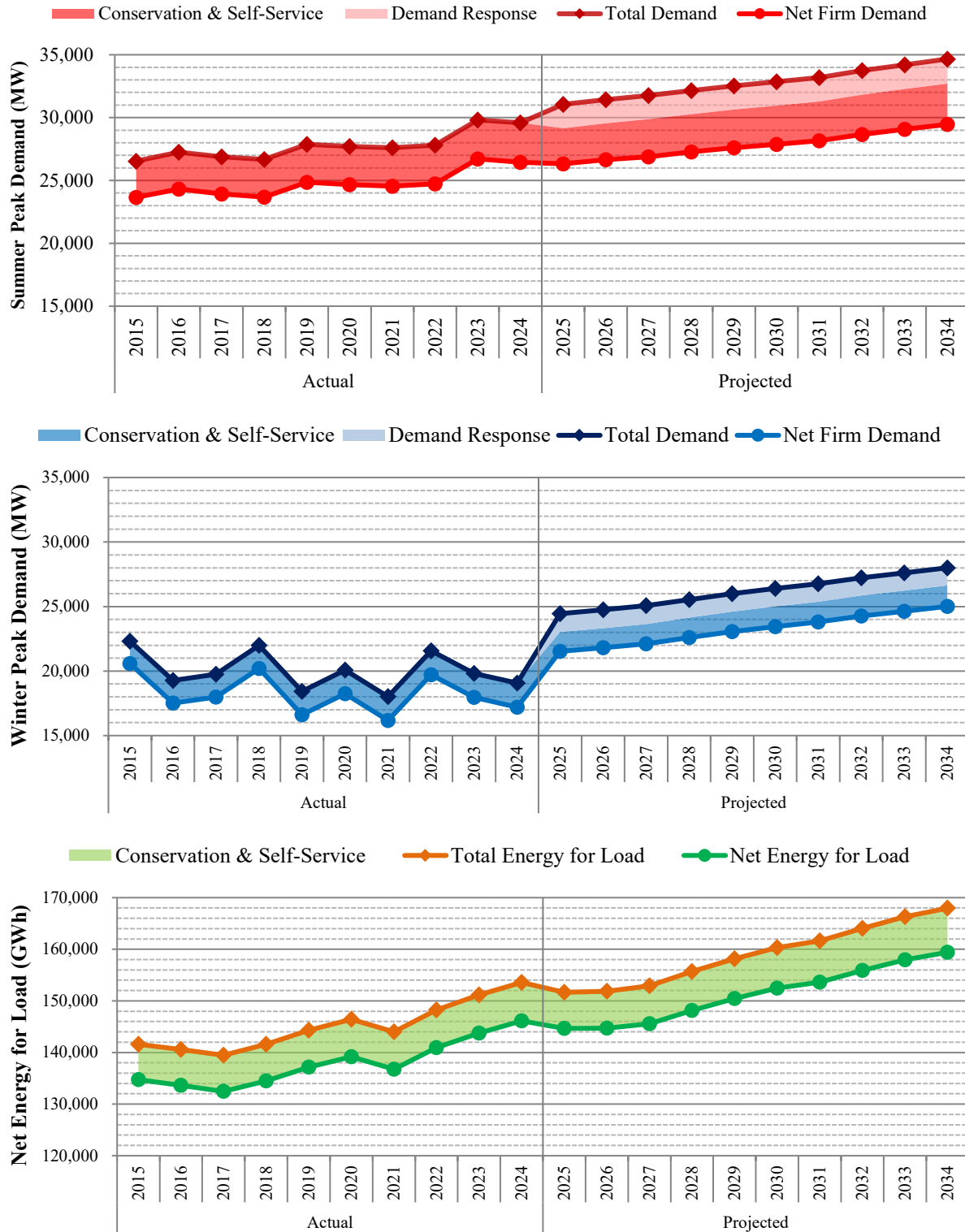
As stated earlier, on January 1, 2019, GPC became a subsidiary of NextEra Energy, Inc., FPL’s parent company, and the systems were integrated into a single electric system, effective January 1, 2022. The three graphs in Figure 22 show FPL and GPC’s combined seasonal peak demand, summer and winter, and net energy for load, for the historic years 2015 through 2021, and integrated FPL/GPC historical data for 2022 through 2024, and forecast data 2025 through 2034.

As an investor-owned utility, FPL is subject to FEECA and currently offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. The Commission reviewed and established energy conservation goals for FPL and approved FPL’s 2025-2034 DSM Plan with modifications.^{10,11} In preparing its 2025 TYSP seasonal peak demand and energy forecasts, FPL reflects these Commission-approved FEECA goals through the forecast period (through 2034), as shown in Figure 22. These graphs include the impact of DSM, and for future years assume that all available demand response resources will be activated during the seasonal peak. During the past 10 years, demand response has not been activated during seasonal peak demand.

¹⁰ Order No. PSC-2024-0505-FOF-EG, issued on December 18, 2024, in Docket No. 20240012-EI, *In re: Commission review of numeric conservation goals (Florida Power & Light Company)*

¹¹ Order No. PSC-2025-0292-PAA-EG, issued on July 29, 2025, in Docket No. 20250048-EG, *In re: Petition for approval of proposed DSM plan, by Florida Power & Light Company.*

Figure 22: FPL Demand and Energy Forecasts



Source: 2025 TYSP

Fuel Diversity

Table 12 shows FPL’s actual net energy for load by fuel type for 2024 and the projected fuel mix for 2034. FPL relies primarily upon natural gas for energy generation, making up 71 percent of net energy for load in 2024. FPL is projected to use natural gas for less than half of its energy generation by 2033. Only three utilities, FPL, GRU, and OUC, are anticipated to reach this level of reduced natural gas consumption by the end of the planning period. By 2034, natural gas will remain FPL’s primary fuel source at approximately 46 percent, while renewables will account for 35 percent, followed by nuclear at 18 percent.

Table 12: FPL Energy Generation by Fuel Type

Fuel Type	Net Energy for Load			
	Actual 2024		Projected 2034	
	GWh	%	GWh	%
Natural Gas	104,335	71.4%	73,448	45.8%
Coal	533	0.4%	738	0.5%
Nuclear	28,009	19.2%	29,136	18.2%
Oil	116	0.1%	1	0.0%
Renewable	13,449	9.2%	56,831	35.4%
Interchange	0	0.0%	0	0.0%
NUG & Other	(340)	(0.2%)	319	0.2%
Total	146,102		160,473	

Source: 2025 TYSP

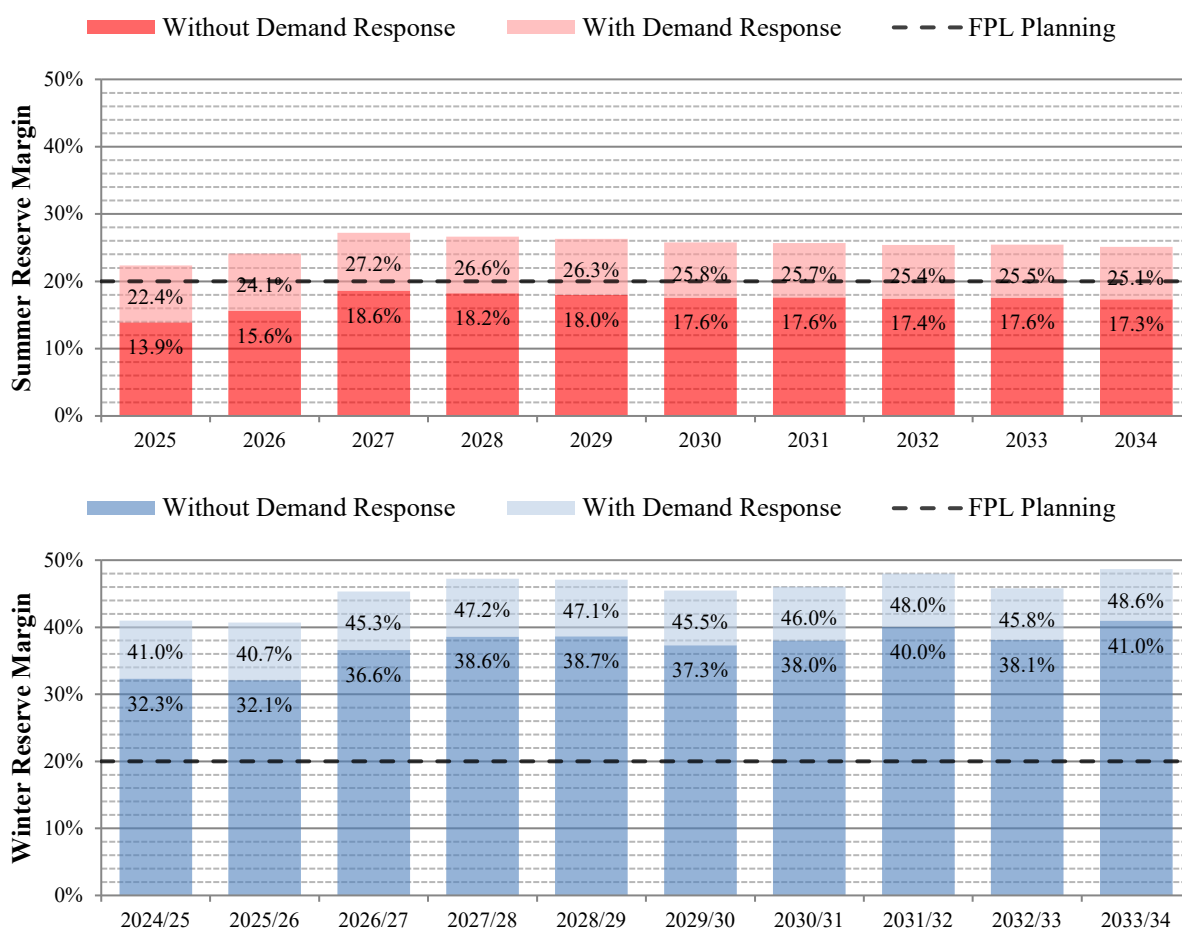
Reliability Requirements

Traditionally, FPL has used three methods for its reliability review. The three methods are a planning reserve margin, a generation-only planning reserve margin, and a LOLP. Since 1999, FPL has utilized a 20 percent planning reserve margin criterion based on a stipulation approved by the Commission.¹² FPL also elects to maintain a generation-only planning reserve margin of 10 percent. The Commission has yet to approve the 10 percent generation-only planning criteria, and it has not been the controlling factor for any unit additions. Figure 23 displays the forecast planning reserve margin with and without the use of demand response. As shown, in the future FPL’s generation needs are controlled by its summer peak.

For its reserve margin planning, FPL has considered only a portion of its solar facilities to be firm for seasonal peak planning purposes, primarily for summer. Of its 6,993 MW of existing utility-owned solar generation, it treats it as contributing 3,194 MW or 45.7 percent in summer, and 92 MW or 1.3 percent in winter. Planned solar generation additions of 17,508 MW are only considered firm for an additional 1,201 MW or 6.9 percent in summer, and 85 MW or 0.5 percent in winter. Therefore, existing utility-owned solar contributes 12.1 percent of its planned summer reserve margin in 2025, with new solar generation increasing the contribution to 14.9 percent in 2034.

¹² Order No. PSC-99-2507-S-EU, issued December 22, 1999, in Docket No. 19981890-EU, *In re: Generic investigation into the aggregate electric utility reserve margins planned for Peninsular Florida*.

Figure 23: FPL Reserve Margin Forecast



Source: 2025 TYSP

In addition to reserve margin, FPL uses LOLP, which is a probabilistic assessment of the duration of time electric customer demand will exceed electric supply, and is measured in units of days per year. FPL uses a maximum LOLP of no more than 0.1 days per year, or approximately 1 day of outage per 10 years. Between the two reliability indices, LOLP and reserve margin, the reserve margin requirement has historically been the controlling factor for the addition of capacity.

In its 2025 TYSP, FPL is shifting from its prior usage of a probabilistic model that evaluated daily peaks for the year to determine its LOLP value, to a new stochastic model to simulate various weather and unit outages, producing several hundred scenarios. FPL's 2025 TYSP only contained a summary of this methodology and did not provide a majority of the inputs or results. Using this analysis, FPL projected significant resource shortfalls primarily in off-peak periods, and is the controlling factor in generation additions. The use of this new methodology is at issue in FPL's current rate case before the Commission in Docket No. 20250011-EI, and any future Commission decision(s) associated with it will be addressed in FPL's next TYSP filing.

Generation Resources

FPL plans multiple unit retirements and additions during the planning period as are described in Table 13. Over the planning period, FPL will retire its remaining coal unit, Scherer Unit 3, which it acquired from its purchase of GPC. This and other retirements are partially offset by planned upgrades of its existing natural gas combined cycle generating units over the planning period, which increases summer capacity by 80 MW.

FPL plans a single new fossil fuel generating addition over the 10-year period, a pair of natural gas-fired combustion turbines in 2032 with a combined capacity of 469 MW. All other generation additions consist of solar and battery facilities, some of which may be constructed in a combined manner. Overall, FPL is planning a total of 17,508 MW and 7,605 MW of solar and battery storage capacity, respectively. For planning purposes, these are only considered to contribute towards summer firm peak a portion of their capacity, or 1,201 MW and 3,585 MW for solar and battery storage, respectively. None of these additions requires a need determination pursuant to the PPSA.

Table 13: FPL Generation Resource Changes

Year	Plant Name & Unit Number	Unit Type	Net Capacity (MW)	Firm Capacity (MW)	Notes
			Sum	Sum	
Retiring Units					
2026	Pea Ridge 1-3	GT NG	12		3 Units Total
2028	Lansing Smith 3A	CT LO	32		
2029	Gulf Clean Energy Center 4 & 5	ST NG	150		2 Units Total
2030	Perdido 1 & 2	IC LFG	3		2 Units Total
2034	Scherer 3	BIT ST	215		
Total Retirements			412	-	
New Units					
2025	Gulf Battery Storage	BS	522	349	
2026	Sited Solar Plants	PV SUN	894	113	12 Sites
2026	Unsited Energy Storage	BS	1,420	997	
2027	Sited Solar Plants	PV SUN	1,192	64	16 Sites
2027	Unsited Energy Storage	BS	820	432	
2028	Unsited Solar Plants	PV SUN	1,490	79	20 Sites
2028	Unsited Energy Storage	BS	596	298	
2029	Unsited Solar Plants	PV SUN	1,788	95	24 Sites
2029	Unsited Energy Storage	BS	596	247	
2030	Unsited Solar Plants	PV SUN	2,235	119	30 Sites
2030	Unsited Energy Storage	BS	596	244	
2031	Unsited Solar Plants	PV SUN	2,235	119	30 Sites
2031	Unsited Energy Storage	BS	596	244	
2032	Unsited Solar Plants	PV SUN	2,235	119	30 Sites
2032	2x0 Manatee CT	CT NG	469		2 Units
2033	Unsited Solar Plants	PV SUN	2,235	119	30 Sites
2033	Unsited Energy Storage	BS	1,192	424	
2034	Unsited Solar Plants	PV SUN	2,235	119	30 Sites
2034	Unsited Energy Storage	BS	1,267	350	
Total New Units			24,613	4,531	
Net Additions			24,207		

Source: 2025 TYSP

Duke Energy Florida, LLC (DEF)

DEF is an investor-owned utility and Florida's second largest electric utility. The Utility's service territory is within the FRCC region and is primarily located in central and west central Florida. As an investor-owned utility, the Commission has regulatory authority over all aspects of utility operations, including rates, reliability, and safety. Pursuant to Section 186.801(2), F.S., the Commission finds DEF's 2025 TYSP suitable for planning purposes.

Load & Energy Forecasts

In 2024, DEF had approximately 2,009,470 customers and annual retail energy sales of 41,132 GWh, accounting for approximately 16.7 percent of Florida's annual retail energy sales. DEF's total customers and total retail energy sales respectively grew approximately 2.1 percent and 0.7 percent in 2024. Over the last 10 years, DEF's customer base has increased by 16.7 percent, while retail energy sales have grown by 6.7 percent.

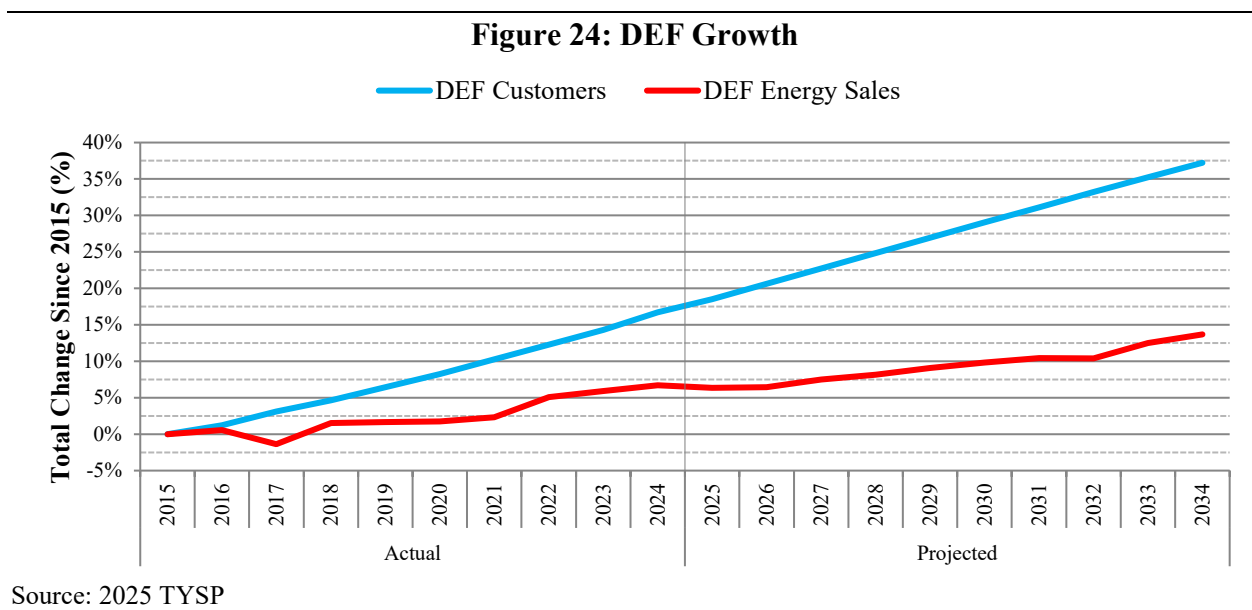
Historically, DEF's customer growth has always been dominated by the residential and commercial customer classes. Customer growth trends are driven by broad economic and demographic factors such as population growth, migration, retirement, housing, mortgage rates, and job growth. More recent information reflects a return to the long-term trend of population migration into Florida. Commercial customer growth typically tracks residential growth supplying needed services.

DEF reported that, from 2015 to 2024, its respective residential and commercial UPC annual growth rates decreased by approximately of 0.7 percent and 0.8 percent. These declines are primarily driven by fluctuations in price of electricity, end-use appliance saturation and efficiency improvement, more stringent building codes, housing type/size, and energy source of the air conditioning equipment. In addition, the Utility is aware that more recently, the customer's ability to self-generate has begun to make an impact on average usage. A small percentage of industrial/commercial customers have chosen to install their own natural gas generators, reducing energy consumption from the power grid. Similarly, residential and some commercial accounts have reduced their utility requirements by installing solar panels behind the meter. DEF also noted that the penetration of plug-in EVs has grown, yielding an increase in residential UPC; however, the impact of rooftop solar generation on UPC continues to exceed the impact of EVs. In contrast, for the same historical period of 2015 to 2024, DEF's industrial UPC increased at an annual growth rate of 3.3 percent due to flat load combined with declining customer counts.

For 2025 to 2034, DEF is expecting its respective residential and commercial UPC to decrease by 1.0 percent and 0.4 percent per year. According to the Utility, the disparity between the going forward rates of residential and commercial UPC is the result of the anticipated growing residential behind the meter solar adoption. DEF is also expecting its industrial UPC to increase 0.7 percent annually, reflecting relatively flat sales and customer growth.

For the 2025 TYSP forecast horizon, DEF's customer base is projected to grow at an average annual rate of 1.6 percent approximately, and its retail energy sales amount is projected to grow at an average annual rate of 0.7 percent approximately.

Figure 24 illustrates historic and prospective forecasted growth rates in customers and retail energy sales for the resource plan DEF filed in its 2025 TYSP.

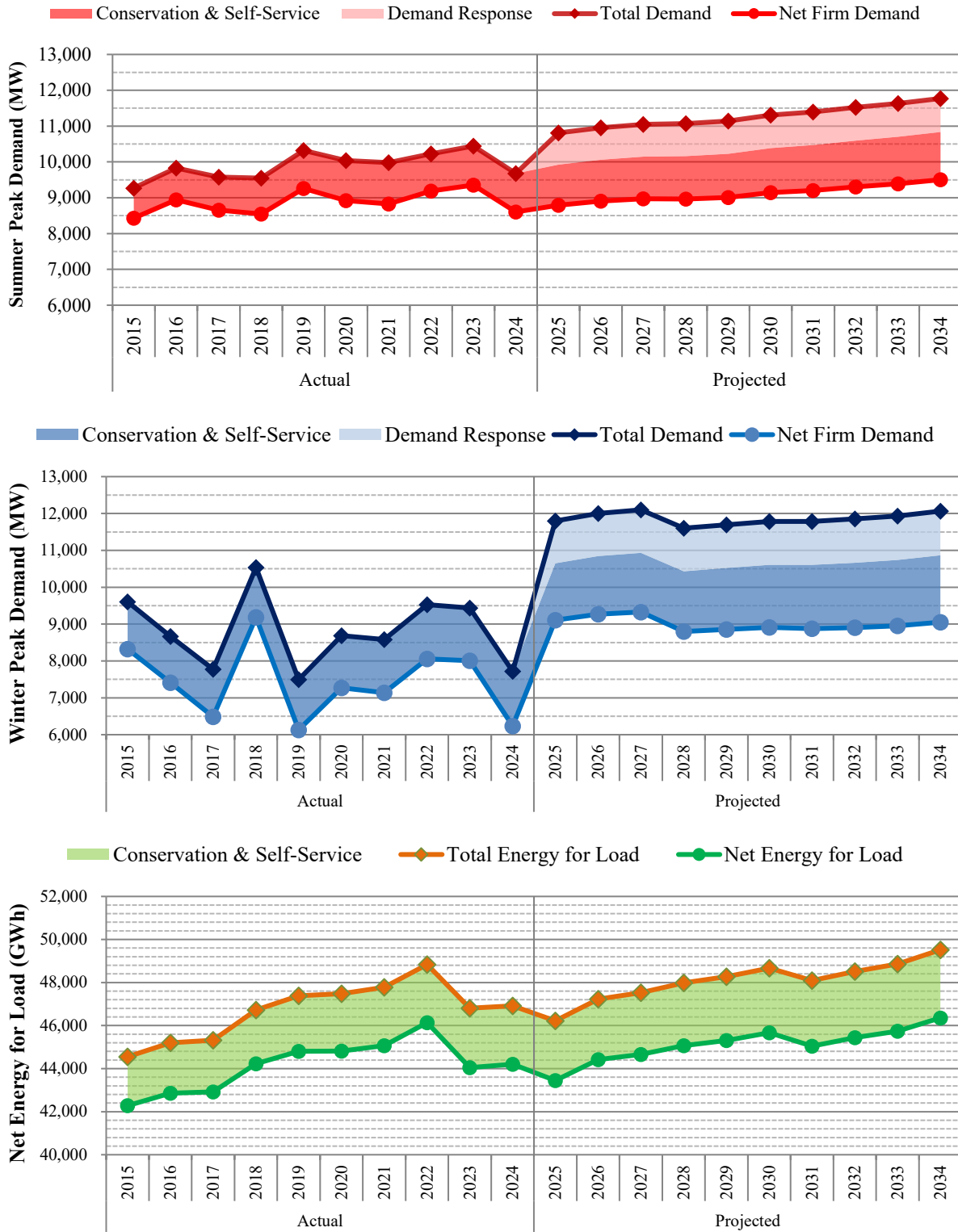


The three graphs in Figure 25 show DEF’s seasonal peak demand and net energy for load for the historic years of 2015 through 2024 and forecast years 2025 through 2034. These graphs include the full impact of DSM and assume that all available demand response resources will be activated during the seasonal peak. During the past 10 years, demand response has not been activated during seasonal peak demand. As an investor-owned utility, DEF is subject to FEECA, and currently offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. The Commission reviewed and established energy conservation goals for DEF and approved DEF’s 2025-2034 DSM Plan.^{13,14} In preparing its 2025 TYSP seasonal peak demand and energy forecasts, DEF reflects these Commission-approved FEECA goals through the forecast horizon (through 2034), as shown in Figure 25.

¹³ Order No. PSC-2024-0429-FOF-EG, issued September 20, 2024, in Docket No. 20240013-EI, *In re: Commission review of numeric conservation goals (Duke Energy Florida, LLC)*.

¹⁴ Order No. PSC-2025-0088-PAA-EG, issued March 24, 2025, in Docket No. 20240169-EG, *In re: Petition for approval of proposed demand-side management plan and demand-side management program standards, by Duke Energy Florida, LLC*.

Figure 25: DEF Demand and Energy Forecasts



Source: 2025 TYSP and Data Responses

Fuel Diversity

Table 14 shows DEF's actual net energy for load by fuel type as of 2024 and the projected fuel mix for 2034. DEF relies primarily upon natural gas for energy generation, making up approximately 85 percent of net energy for load in 2024. DEF plans to increase renewable energy generation over the planning period, offsetting both natural gas and coal usage. DEF projects that renewable energy will provide 29 percent of its generation by 2034, which is the fourth highest percentage of renewable energy generation in 2034 of the TYSP Utilities. Natural gas would remain the primary fuel, at 70 percent in 2034.

Table 14: DEF Energy Generation by Fuel Type

Fuel Type	Net Energy for Load			
	Actual 2024		Projected 2034	
	GWh	%	GWh	%
Natural Gas	37,494	84.8%	32,440	70.0%
Coal	3,262	7.4%	657	1.4%
Nuclear	0	0.0%	0	0.0%
Oil	30	0.1%	3	0.0%
Renewable	3,354	7.6%	13,250	28.6%
Interchange	(541)	(1.2%)	9	0.0%
NUG & Other	601	1.4%	0	0.0%
Total	44,200		46,359	

Source: 2025 TYSP and Data Responses

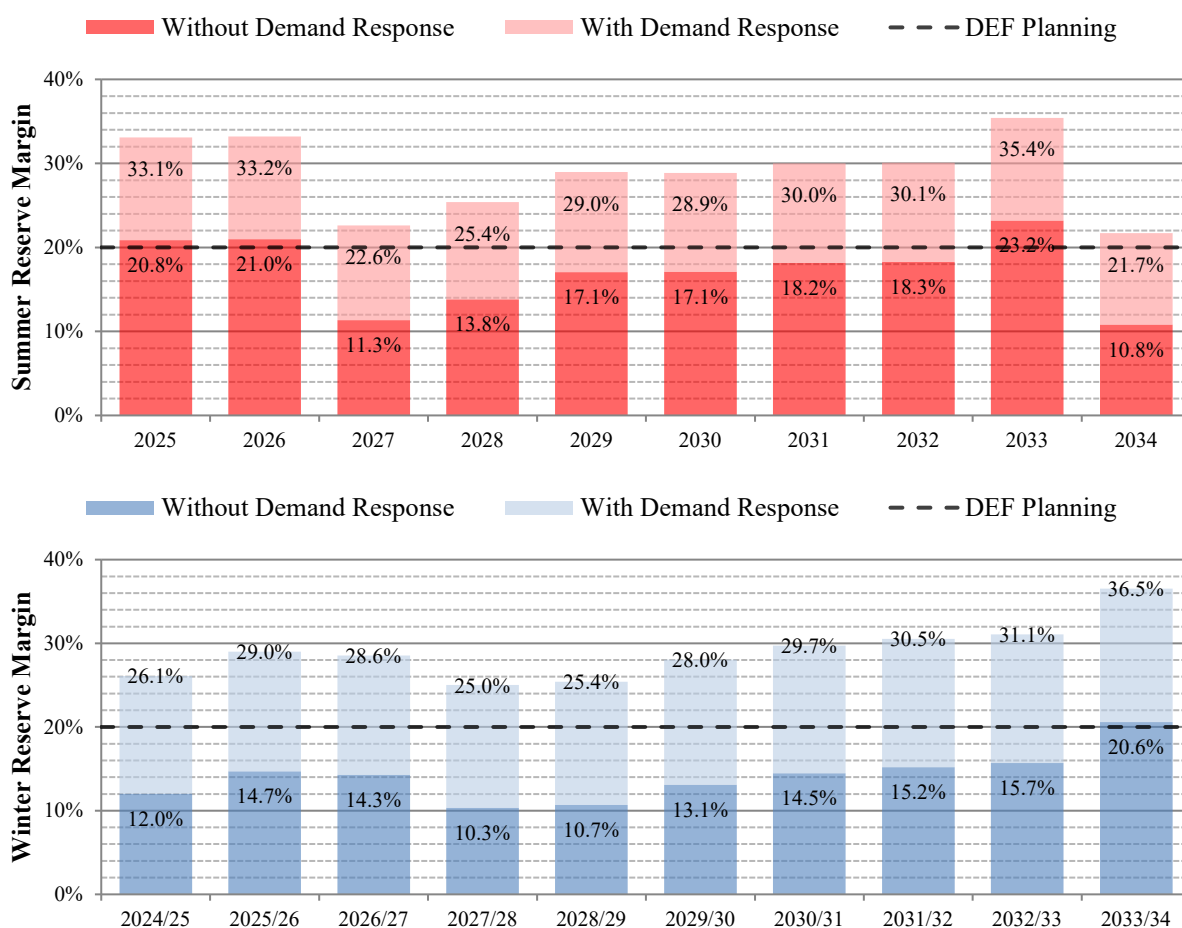
Reliability Requirements

Since 1999, DEF has utilized a 20 percent planning reserve margin criterion based on a stipulation approved by the Commission.¹⁵ Figure 26 displays the forecast planning reserve margin for DEF through the planning period for both seasons, with and without the use of demand response. As shown in the figure, DEF's generation needs are mostly controlled by its summer peaking throughout the planning period.

As part of its evaluation of its system reliability, DEF also conducted an evaluation of the contribution of its existing and planned solar generation assets towards its seasonal peaks. The methodology selected by DEF, Effective Load Carrying Capacity (ELCC), determined that DEF's existing solar capacity has a reduced benefit for summer peaks than previously calculated, from 54.7 percent to 53.7 percent and that the facilities also contribute approximately 5 percent to the winter peak. The ELCC methodology also provides that as additional resources are added to the system, the net contribution will decrease, similar to observed trends in prior planning methodologies. DEF plans to perform future ELCC studies to account for new solar and battery additions. The Commission will have an opportunity to review this methodology during a future proceeding.

¹⁵ Order No. PSC-99-2507-S-EU, issued December 22, 1999, in Docket No. 19981890-EU, *In re: Generic investigation into the aggregate electric utility reserve margins planned for Peninsular Florida*.

Figure 26: DEF Reserve Margin Forecast



Source: 2025 TYSP

Generation Resources

DEF projects multiple unit retirements and additions during the planning period, as described in Table 15. Over the planning period, DEF will retire its only remaining coal-fired units, Crystal River Units 4 and 5, in addition to several simple cycle combustion turbines fueled by oil or natural gas. This is partially offset by planned upgrades to its existing natural gas combined cycle generating units, which increase summer capacity by 256 MW, and improved transmission facilities that will allow DEF to fully utilize the acquired Osprey plant, which increases its firm contribution to 371 MW. DEF also plans on several solar QF purchases, totaling an additional 225 MW.

DEF identified two new fossil fuel generating addition over the 10-year period, each a pair of natural gas-fired combustion turbines, with combined capacities of 491 MW in 2033 and 449 MW in 2034. All other generation additions consist of solar and battery facilities, with a majority of the storage facilities constructed in combination with the solar additions. Overall, DEF is planning a total of 4,463 MW and 1,330 MW of solar and battery storage capacity, respectively. For planning purposes, these are only considered to contribute towards summer firm peak a portion of their capacity, or 873 MW and 1,088 MW for solar and battery storage, respectively. None of these additions requires a need determination pursuant to the PPSA.

Table 15: DEF Generation Resource Changes

Year	Plant Name & Unit Number	Unit Type	Net Capacity (MW)	Firm Capacity (MW)	Notes
			Sum	Sum	

Retiring Units					
2026	Bayboro Units P1-P4	CT DFO	137		4 Units
2027	Debary Units P2-P6	CT DFO	227		5 Units
2027	Bartow Units P1 & P3	CT DFO	82		2 Units
2034	Intercession City P1-P6	CT DFO	275		6 Units
2034	Bartow P2, P4	CT NG	86		2 Units
2034	Suwannee P1-P3	CT NG	145		3 Units
2034	Crystal River 4 & 5	ST BIT	1,422		2 Units
Total Retirements			2,374	0	

New Units					
2025	Sundance Solar Plant	PV SUN	75	26	
2026	Sited Solar Plants	PV SUN	524	186	7 Sites
2027	Unsited Solar Plants	PV SUN	300	100	4 Sites
2027	Powerline Energy Storage	BAT	100	90	
2028	Unsited Solar Plants	PV SUN	225	62	3 Sites
2028	Unsited Solar Plus Storage	PV SUN	150	32	2 Sites
2028	Unsited Solar Plus Storage	BAT	100	90	
2029	Unsited Solar Plant	PV SUN	225	62	3 Sites
2029	Unsited Battery Storage	BAT	225	203	
2029	Unsited Solar Plus Storage	PV SUN	150	32	2 Sites
2029	Unsited Solar Plus Storage	BAT	100	90	
2030	Unsited Solar Plants	PV SUN	225	48	3 Sites
2030	Unsited Solar Plus Storage	PV SUN	150	32	2 Sites
2030	Unsited Solar Plus Storage	BAT	100	90	
2031	Unsited Solar Plants	PV SUN	449	74	6 Sites
2031	Unsited Solar Plus Storage	PV SUN	150	23	2 Sites
2031	Unsited Solar Plus Storage	BAT	100	90	
2032	Unsited Solar Plants	PV SUN	449	48	6 Sites
2032	Unsited Solar Plus Storage	PV SUN	150	14	2 Units
2032	Unsited Solar Plus Storage	BAT	100	85	
2033	Unsited Solar Plants	PV SUN	449	43	6 Sites
2033	Undesignated CT P1 & P2	CT NG	491		2 Units
2033	Unsited Solar Plus Storage	PV SUN	150	14	2 Sites
2033	Unsited Solar Plus Storage	BAT	100	70	
2034	Undesignated CT P3 & P4	CT NG	449		2 Units
2034	Unsited Battery Storage	BAT	300	210	
2034	Unsited Solar Plus Storage	PV SUN	150	14	2 Units
2034	Unsited Solar Plus Storage	BAT	100	70	
Total New Units			6,236	1,898	

Net Additions			3,862		
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Source: 2025 TYSP

Tampa Electric Company (TECO)

TECO is an investor-owned utility and Florida's third largest electric utility. The Utility's service territory is within the FRCC region and consists primarily of the Tampa metropolitan area. As an investor-owned utility, the Commission has regulatory authority over all aspects of utility operations, including rates, reliability, and safety. Pursuant to Section 186.801(2), F.S., the Commission finds TECO's 2025 TYSP suitable for planning purposes.

Load & Energy Forecasts

In 2024, TECO had approximately 849,877 customers and annual retail energy sales of 20,702 GWh, accounting for approximately 8.4 percent of Florida's annual retail energy sales. Over the last 10 years, TECO's customer base has increased by approximately 18.3 percent, while retail energy sales have increased by approximately 9.0 percent.

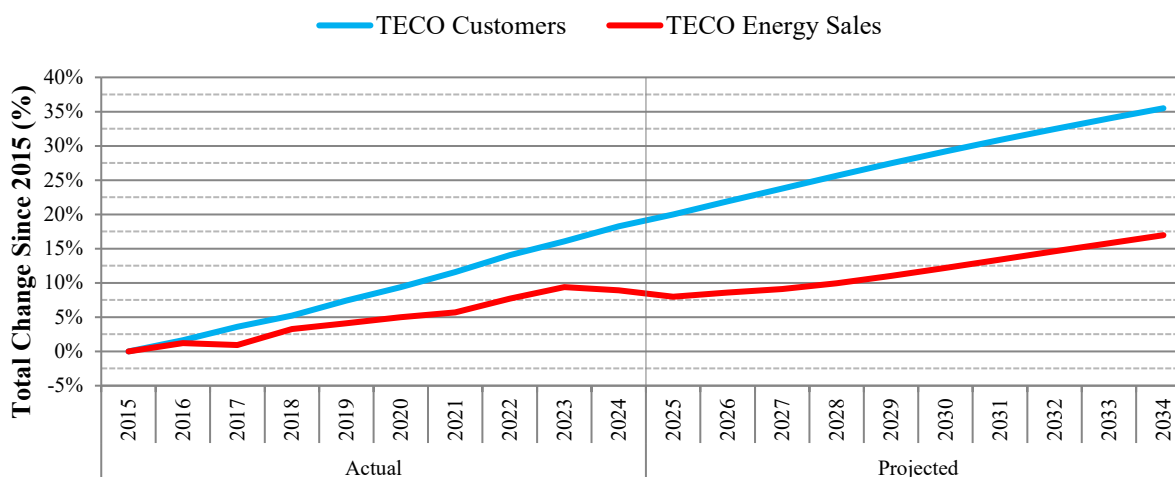
TECO's total customer growth in 2024 averaged 1.9 percent approximately with the residential class being the engine behind the growth. Over the next 10 years customer growth is expected to increase at an average rate of 1.4 percent annually.

TECO's residential UPC and commercial UPC growth rates were both slightly lower in 2024 than in 2023, primarily due to the record-breaking heat in 2023. TECO's industrial UPC declined by 1.4 percent in 2024 and is expected to be flat for 2025. Over the forecast horizon, TECO's residential UPC is expected to decline at an average annual rate of 0.3 percent over the TYSP's forecast horizon. The primary drivers behind the decline in per-customer usage are increases in appliance efficiencies, lighting efficiencies, energy efficiency in new homes, conservation efforts, and housing mix. TECO's commercial and industrial UPC is projected to decrease slightly, at an annual rate of 0.1 percent and 0.2 percent, respectively.

In 2024, TECO's retail energy sales were 0.4 percent lower than in 2023. For the next 10 years, the Utility's retail energy sales are projected to grow at an annual average rate of approximately 0.9 percent. This is below the projected customer growth rate of 1.4 percent primarily due to continued declines in UPC, as well as declines in the phosphate sector as the mining industry continues to move south and out of TECO's service territory.

Figure 27 illustrates historic and prospective forecasted growth rates in customers and retail energy sales for the resource plan that TECO filed in its 2025 TYSP.

Figure 27: TECO Growth



Source: 2025 TYSP

The three graphs in Figure 28 show TECO’s seasonal peak demand and net energy for load for the historic years of 2015 through 2024 and forecast years 2025 through 2034. These graphs include the full impact of DSM, and assume that all available demand response resources will be activated during the seasonal peak. Historically, demand response has not been activated during seasonal peak demand, excluding the summer of 2013 and winters of 2017-2018 and 2018-2019. As an investor-owned utility, TECO is subject to FEECA and currently offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. The Commission reviewed and established energy conservation goals for TECO and approved TECO’s 2025-2034 DSM Plan.^{16,17} In preparing its 2025 TYSP seasonal peak demand and energy forecasts, TECO reflects these Commission-approved FEECA goals through the forecast period (through 2034), as shown in Figure 28.

¹⁶ Order No. PSC-2024-0430-FOF-EG, issued September 20, 2024, in Docket No. 20240014-EI, *In re: Commission review of numeric conservation goals (Tampa Electric Company)*.

¹⁷ Order No. PSC-2025-0093-PAA-EG, issued March 24, 2025, in Docket No. 20240163-EG, *In re: Petition for approval of proposed demand-side management plan and demand-side management program standards, by Tampa Electric Company*.

Figure 28: TECO Demand and Energy Forecasts



Source: 2025 TYSP and Data Responses

Fuel Diversity

Table 16 shows TECO's actual net energy for load by fuel type as of 2024 and the projected fuel mix for 2034. Natural gas is used for the majority of TECO's energy generation, and accounts for approximately 82 percent of net energy for load in 2024 and is projected to account for approximately 72 percent in 2034. Renewables, primarily solar, are anticipated to increase from 10 percent in 2024 to 25 percent in 2034.

Table 16: TECO Energy Generation by Fuel Type

Fuel Type	Net Energy for Load			
	Actual 2024		Projected 2034	
	GWh	%	GWh	%
Natural Gas	17,999	82.4%	16,864	72.1%
Coal	58	0.3%	323	1.4%
Nuclear	0	0.0%	0	0.0%
Oil	4	0.0%	0	0.0%
Renewable	2,235	10.2%	5,870	25.1%
Interchange	33	0.2%	281	1.2%
Other	1,523	7.0%	36	0.2%
Total	21,852		23,374	

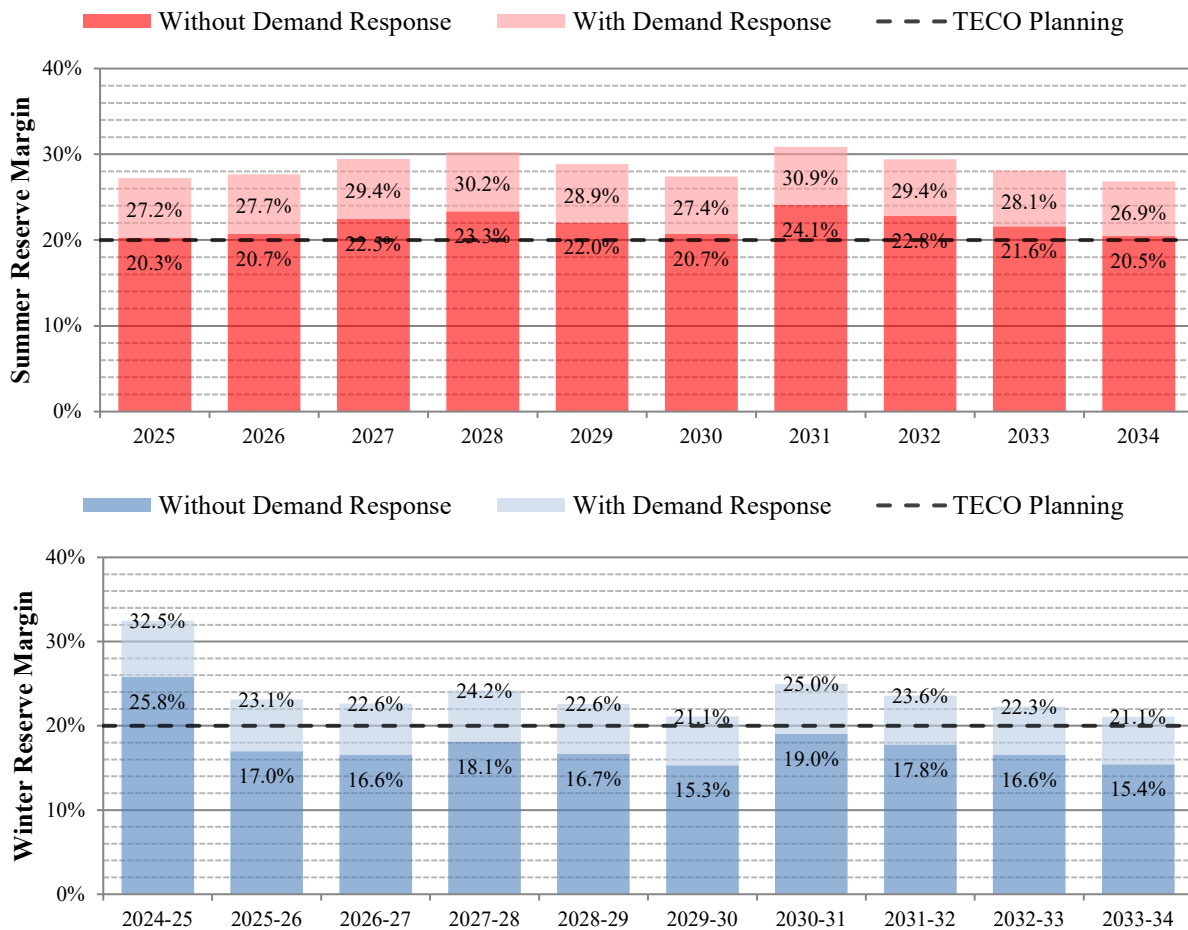
Source: 2025 TYSP and Data Responses

Reliability Requirements

Since 1999, TECO has utilized a 20 percent planning reserve margin criterion based on a stipulation approved by the Commission.¹⁸ TECO also elects to maintain a minimum supply-side reserve margin of 7 percent. Figure 29 displays the forecast planning reserve margin for TECO through the planning period for both seasons, with and without the use of demand response. As shown in the figure, TECO's generation needs are being controlled by its winter peak. TECO's current and planned investments in solar generation contribute to this shift in planning because solar resources provide coincident capacity during the summer peak but not the winter peak. TECO's 7 percent supply-side only reserve margin is not the controlling factor for any planned unit additions.

¹⁸ Order No. PSC-99-2507-S-EU, issued December 22, 1999, in Docket No. 19981890-EU, *In re: Generic investigation into the aggregate electric utility reserve margins planned for Peninsular Florida*.

Figure 29: TECO Reserve Margin Forecast



Source: 2025 TYSP

Generation Resources

TECO projects multiple unit additions during the planning period, as described in Table 15. While TECO does not plan to retire any generating units, it is converting Polk Unit 1 from a petcoke-fired combined cycle system to a natural gas-fired simple cycle combustion turbine, which reduces its output by approximately 30 MW. This is offset by planned upgrades to its existing natural gas combined cycle generating units, which increase summer capacity by 140 MW.

TECO plans two new fossil fuel generating additions over the 10-year period, all natural gas-fired, including a set of four reciprocating engines in 2025 with a capacity of 75 MW, and a simple cycle turbine in 2031 with a capacity of 222 MW. All other generation additions consist of solar and battery facilities. Overall, TECO is planning a total of 1,340 MW and 195 MW of solar and battery storage capacity, respectively. For planning purposes, the batteries are assumed to contribute their full capacity, while the solar facilities are only considered to contribute towards summer firm peak a portion of their capacity, 26 MW. None of these additions requires a need determination pursuant to the PPSA.

Table 17: TECO Generation Resource Changes

Year	Plant Name & Unit Number	Unit Type	Net Capacit y (MW)	Firm Capacit y (MW)	Notes
			Sum	Sum	

Retiring Units					
	None				
Total Retirements			0	0	

New Units					
2025	South Tampa Resilience Project	IC NG	75		4 Units
2025	Sited Solar Plants	PV SUN	149	7	2 Sites
2025	Sited Energy Storage	BAT	100	100	3 Sites
2026	Sited Solar Plants	PV SUN	227	8	4 Sites
2027	Brewster Solar Plant	PV SUN	16	0	1 Site
2027	Unsited Solar Plant	PV SUN	149	2	2 Sites
2027	Unsited Energy Storage	BAT	95	95	2 Sites
2028	Unsited Solar Plants	PV SUN	204	3	3 Sites
2029	Unsited Solar Plants	PV SUN	149	2	2 Sites
2030	Unsited Solar Plants	PV SUN	149	2	2 Sites
2031	Future CT 1	CT NG	222		
2031	Unsited Solar Plant	PV SUN	75	1	1 Site
2032	Unsited Solar Plant	PV SUN	75	1	1 Site
2033	Unsited Solar Plant	PV SUN	75	1	1 Site
2034	Unsited Solar Plant	PV SUN	75	1	1 Site
Total New Units			1,835	223	

Net Additions			1,835	223	
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Source: 2025 TYSP

Florida Municipal Power Agency (FMPA)

FMPA is a governmental wholesale power company owned by several Florida municipal utilities throughout the state. Collectively, FMPA is Florida's seventh largest electric utility and third largest municipal electric utility. While FMPA has 31 member systems, only those members that are participants in the All-Requirements Power Supply Project (ARP) are addressed in the Utility's TYSP. FMPA is responsible for planning activities associated with ARP member systems. For a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds FMPA's 2025 TYSP suitable for planning purposes.

Load & Energy Forecasts

In 2024, FMPA had approximately 293,231 customers and annual retail energy sales of 6,254 GWh, accounting for approximately 2.5 percent of Florida's annual retail energy sales. Over the last 10 years, FMPA's customer base has increased by 17.6 percent, while energy sales have increased by 11.3 percent.

In 2024, FMPA's total customer growth averaged 2.5 percent approximately. It noticed strong customer count gains in certain areas of the ARP participant service territories where residential sector expansion is the primary driver of customer gains. Florida in-migration has continued to be the leading driver of ARP customer growth.

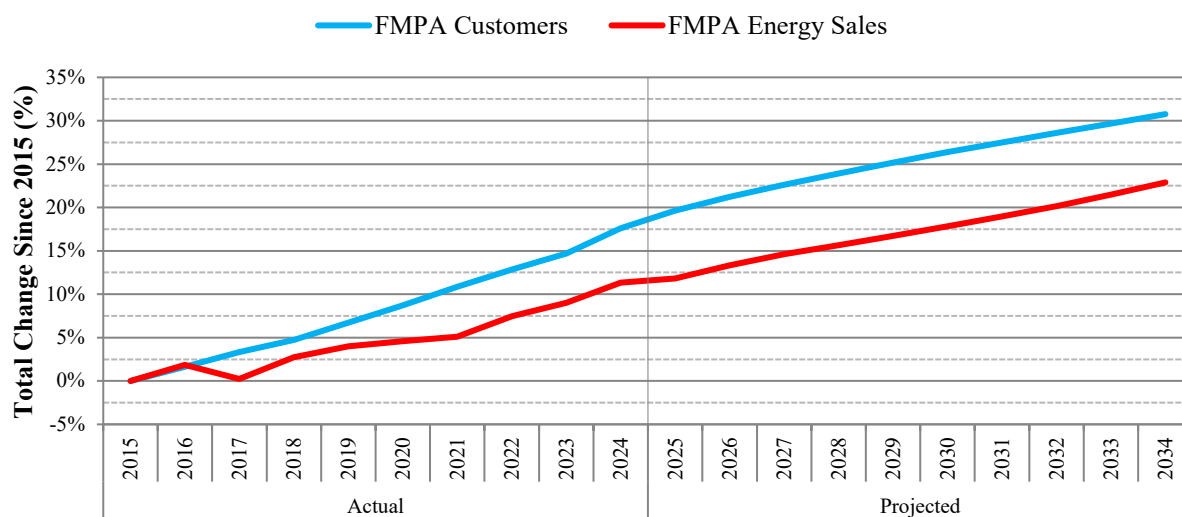
FMPA's annual increase in energy sales was 2.1 percent in 2024, higher than the 1.5 percent increase recorded in 2023. According to the Utility, this is due to an increase in seasonal firm capacity and energy sales that did not take place in the year prior.

FMPA noted that, in aggregate, its UPC has been relatively flat in both the residential and non-residential sectors after controlling for weather variation from normal conditions. The Utility noted that a continued orientation toward conservation and continued improvement in energy efficiency, driven primarily from technological advances, equipment standards, and enhanced building codes, place downward pressure on average usage.

FMPA acknowledged that, over the last several years, EVs adoption has steadily increased in Utility's service areas. Given the significance of this trend, FMPA's 2025 load forecast includes a projection of the future impact of EV charging energy.

For the current 10-year forecast horizon, FMPA is projecting an average annual growth rate of approximately 1.0 percent for its customer base, and a 1.1 percent average annual growth rate for energy sales. Figure 30 illustrates historic and prospective forecasted growth rates in customers and retail energy sales for the resource plan that FMPA filed in its 2025 TYSP.

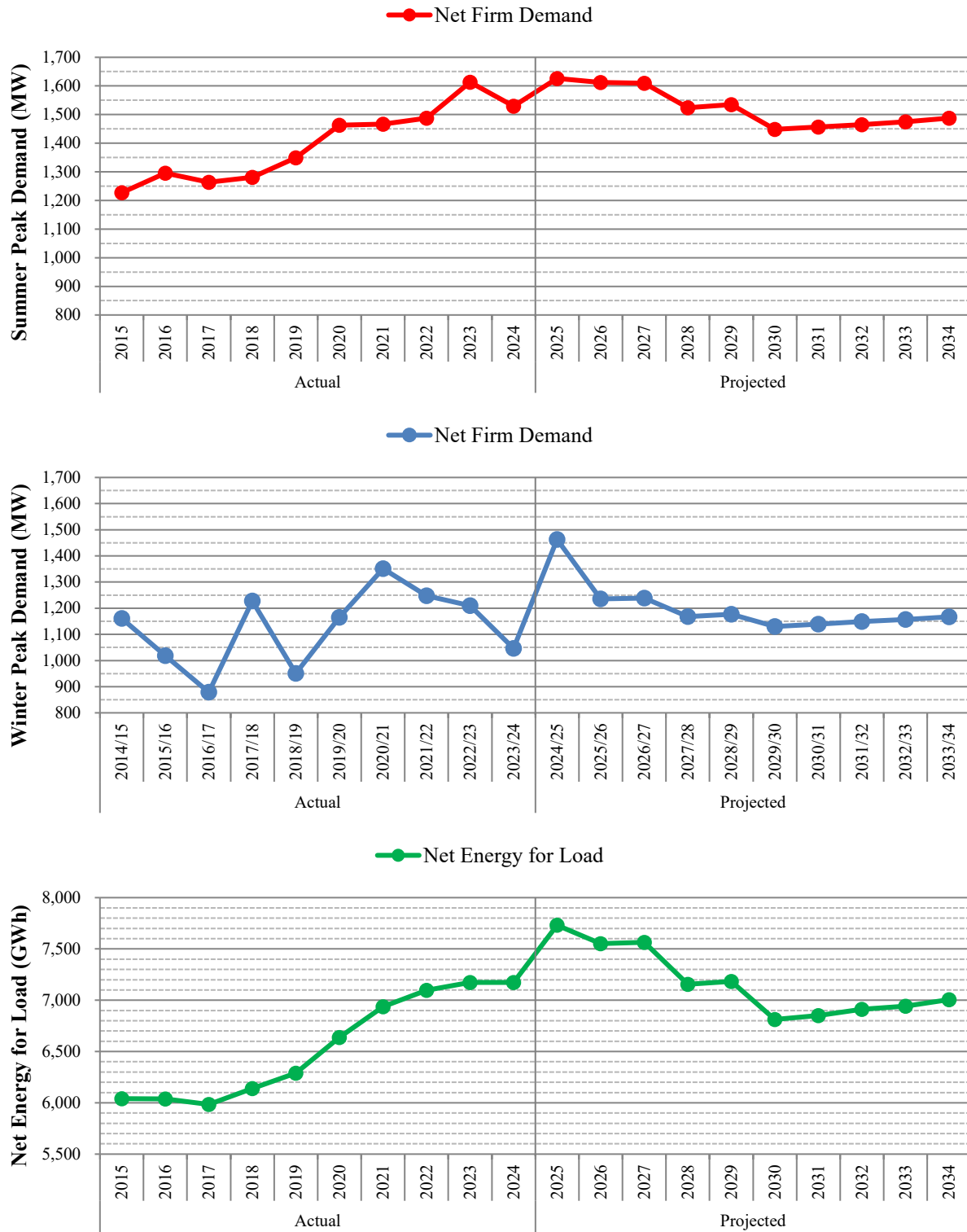
Figure 30: FMPA Growth



Source: 2025 TYSP

The three graphs in Figure 31 show FMPA’s seasonal peak demand and net energy for load for the historic years 2015 through 2024 and forecast years 2025 through 2034. As FMPA is a wholesale power company, it does not directly engage in energy efficiency or demand response programs. ARP member systems do offer DSM programs, the impacts of which are included in the graphs.

Figure 31: FMPA Demand and Energy Forecasts



Source: 2025 TYSP and Data Responses

Fuel Diversity

Table 18 shows FMPA's actual net energy for load by fuel type as of 2024 and the projected fuel mix for 2034. FMPA uses natural gas as its primary fuel, producing 85 percent of energy in 2024 and increasing to 90 percent of energy by 2034. FMPA projects to end energy generation from coal beginning in 2028 with the conversion of the Stanton Energy Center Unit 2 from coal to natural gas-fired generation. Overall, coal-generated energy is being replaced by a combination of increased natural gas, nuclear, and renewable energy sources.

Table 18: FMPA Energy Generation by Fuel Type

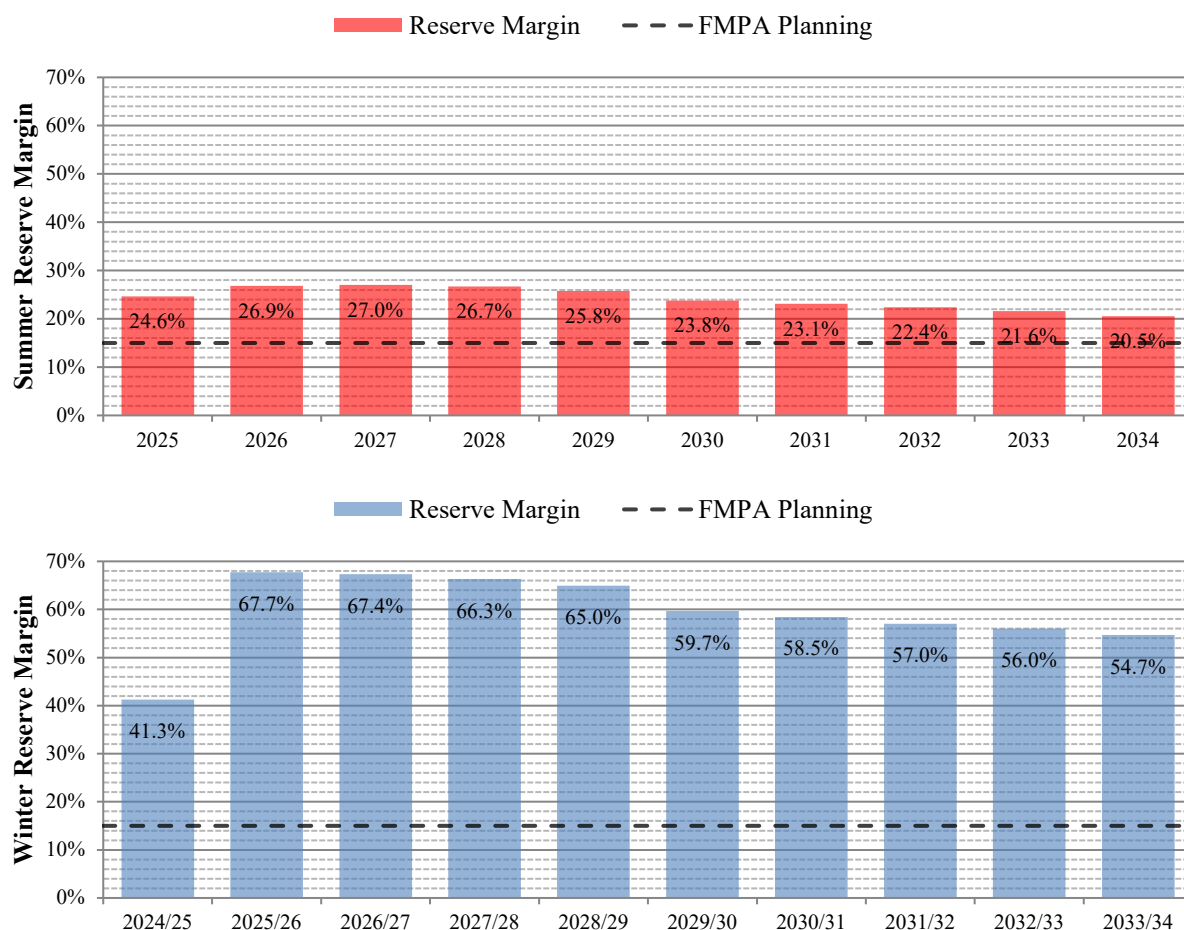
Fuel Type	Net Energy for Load			
	Actual 2024		Projected 2034	
	GWh	%	GWh	%
Natural Gas	6,073	84.7%	6,275	89.6%
Coal	582	8.1%	0	0.0%
Nuclear	353	4.9%	390	5.6%
Oil	3	0.0%	1	0.0%
Renewable	161	2.2%	340	4.9%
Interchange	0	0.0%	0	0.0%
NUG & Other	0	0.0%	0	0.0%
Total	7,172		7,006	

Source: 2025 TYSP and Data Responses

Reliability Requirements

FMPA utilizes a 15 percent planning reserve margin criterion. Figure 32 displays the forecast planning reserve margin for FMPA through the planning period for both seasons. As shown in the figure, FMPA's generation needs are controlled by its summer peak throughout the planning period.

Figure 32: FMPA Reserve Margin Forecast



Source: 2025 TYSP

Generation Resources

FMPA plans on retiring and adding one unit each during the planning period, as illustrated in Table 19. The Stanton Energy Center Unit 1, a coal steam unit which is jointly owned with OUC and others, is scheduled for retirement in 2025. In 2028, the Stanton Energy Center Unit 2 is scheduled for conversion from a coal-fired to a natural gas-fired steam unit. FMPA is acquiring the existing Orange Cogeneration 104 MW natural gas-fired combined cycle merchant facility in 2026. In addition to its utility-owned generation, FMPA has entered into multiple purchased power agreements (PPAs) for additional solar capacity.

Table 19: FMPA Generation Resource Changes

Year	Plant Name & Unit Number	Unit Type	Net Capacity (MW)	Notes
			Sum	
Retiring Units				
2025	Stanton Energy Center Unit 1	ST BIT	118	Jointly Owned Unit
Total Retirements			118	
New Units				
2026	Bartow Energy Center	CC NG	104	Merchant Acquisition
Total New Units			104	
Net Additions			(14)	

Source: 2025 TYSP

Gainesville Regional Utilities (GRU)

GRU is a municipal utility and the smallest electric utility by sales required to file a TYSP. The Utility's service territory is within the FRCC region and consists of the City of Gainesville and its surrounding area. GRU also provides wholesale power to the City of Alachua and Clay Electric Cooperative. As a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds GRU's 2025 TYSP suitable for planning purposes.

Load & Energy Forecasts

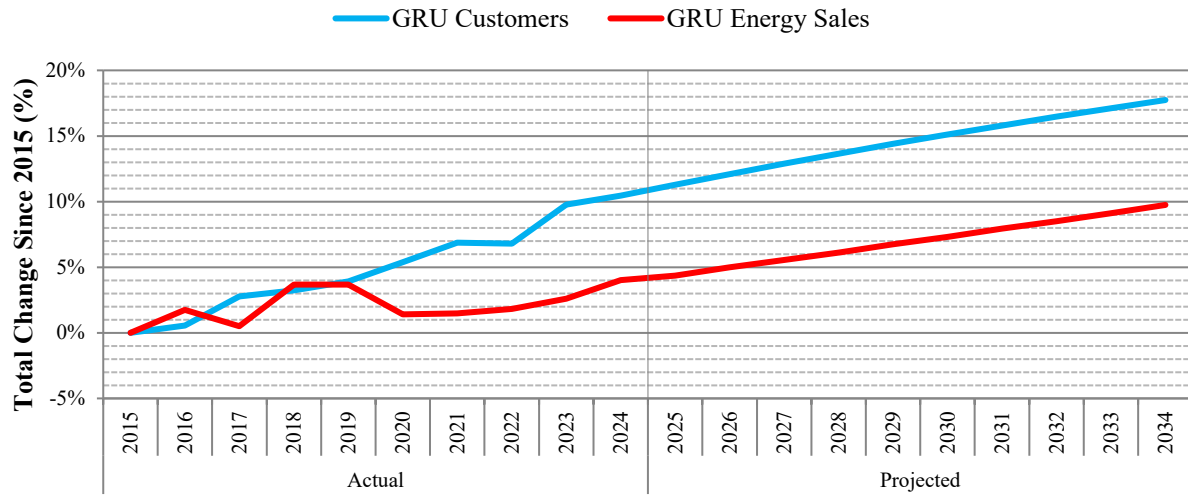
In 2024, GRU had approximately 104,510 customers and annual retail energy sales of 1,836 GWh, accounting for approximately 0.8 percent of Florida's annual retail energy sales. In the same year, the Utility's total customer growth and total retail sales growth were approximately 0.6 percent and 1.4 percent, respectively. Over the last 10 years, GRU's customer base has increased by approximately 10.4 percent with an annual growth rate of 1.1 percent, while retail energy sales have increased by approximately 4.0 percent with an annual growth rate of 0.4 percent.

Over the past 10 years, GRU's residential UPC declined approximately 0.2 percent per year, while its non-residential UPC declined approximately 0.8 percent per year. Some of the factors that influence these UPC declines include energy efficiency standards, improved building codes, increasing electricity prices, and growing participation in behind-the-meter solar energy. For the forecast period, GRU projected its residential UPC will remain flat. In the non-residential sectors, increasing real price of electricity is projected to play a large role such that UPC will decline at a rate of approximately 0.2 percent per year.

For the current 10-year forecast horizon, GRU's number of customers and retail energy sales will both grow nearly the same at an annual average rate of approximately 0.6 percent. The Utility indicated that its projected growth of retail energy sales is supported by its projected increase in the number of customers and offset negatively by flat or declining UPC.

Figure 33 illustrates historic and prospective forecasted growth rates in customers and retail energy sales for the resource plan that GRU filed in its 2025 TYSP.

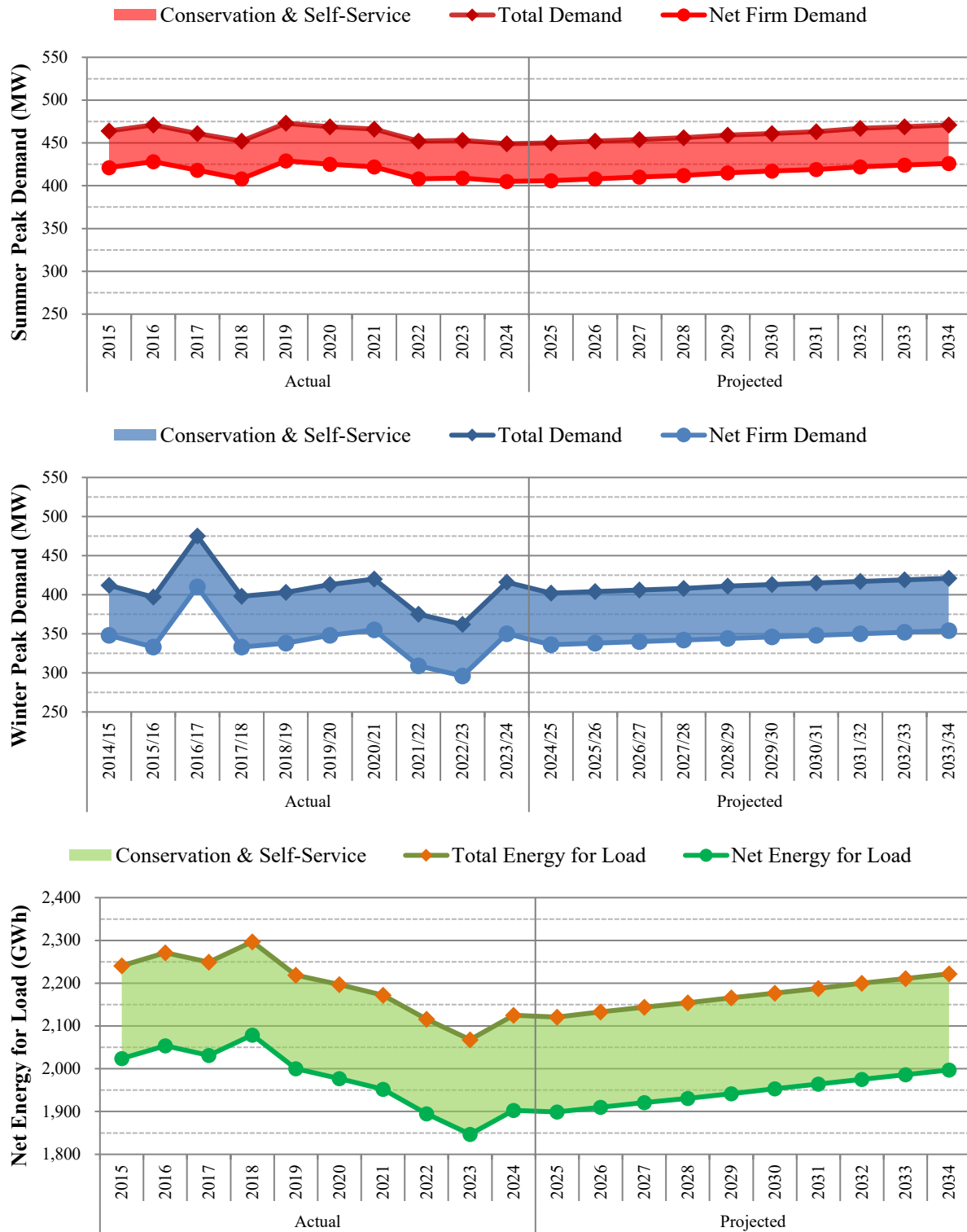
Figure 33: GRU Growth



Source: 2025 TYSP

The three graphs in Figure 34 show GRU's seasonal peak demand and net energy for load for the historic years of 2015 through 2024 and forecast years 2025 through 2034. GRU engages in multiple energy efficiency programs to reduce customer peak demand and annual energy for load. The graphs in Figure 34 include the impact of these DSM programs.

Figure 34: GRU Demand and Energy Forecasts



Source: 2025 TYSP

Fuel Diversity

Table 20 shows GRU's actual net energy for load by fuel type as of 2024 and the projected fuel mix for 2034. GRU relies primarily upon natural gas for energy generation, making up 82 percent of net energy for load in 2024. GRU is projected to use natural gas for less than half of its energy generation by 2034. Only three utilities, FPL, GRU, and OUC, are anticipated to reach this level of reduced natural gas consumption by the end of the planning period. By 2034, natural gas will remain GRU's primary fuel source at 48 percent, while renewables will account for 33 percent. Coal generation is anticipated to increase from approximately 0 percent in 2024 to 16 percent in 2034, with the increase being associated with the co-firing of coal and natural gas at Deerhaven Unit FS02, GRU's only remaining unit capable of burning coal.

Table 20: GRU Energy Generation by Fuel Type

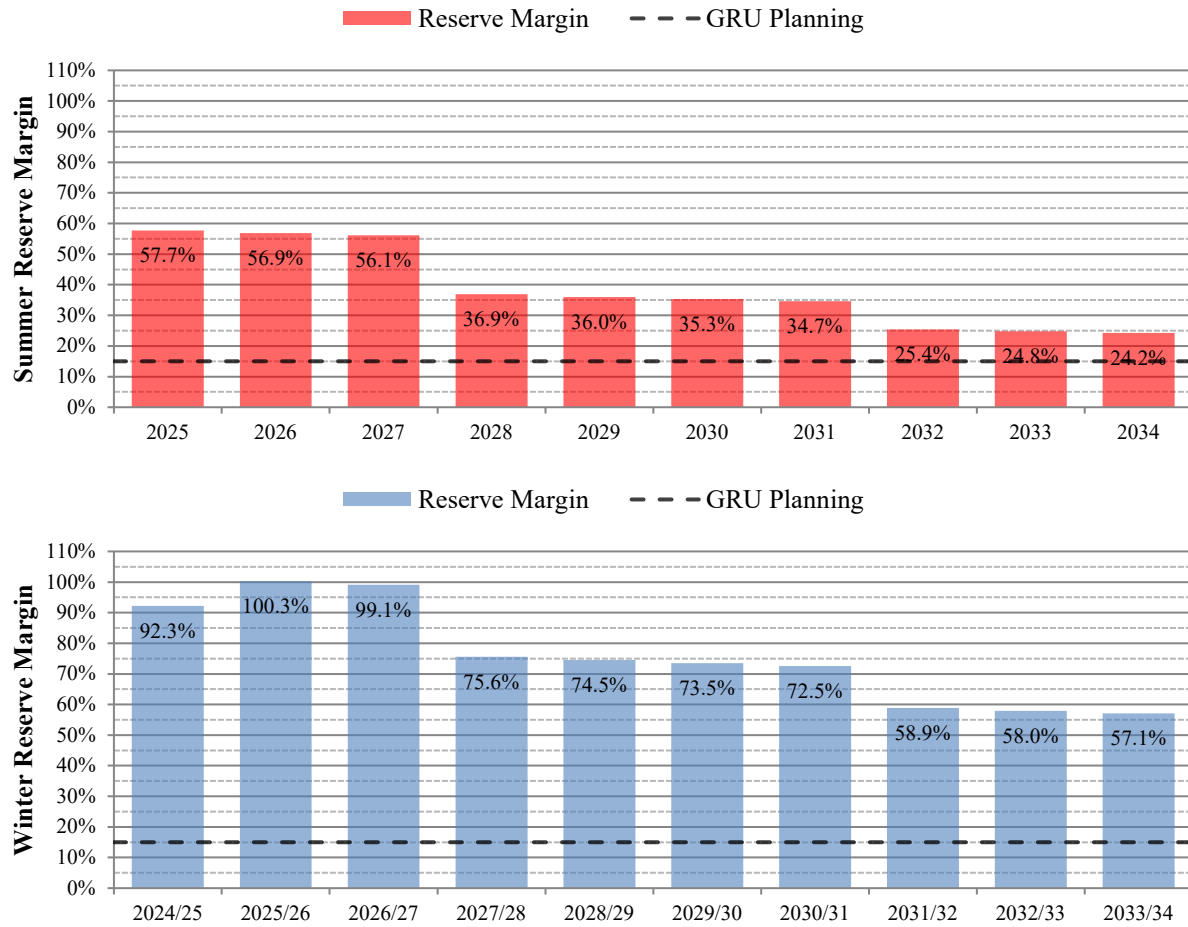
Fuel Type	Net Energy for Load			
	Actual 2024		Projected 2034	
	GWh	%	GWh	%
Natural Gas	1,562	82.1%	959	48.0%
Coal	2	0.1%	316	15.8%
Nuclear	0	0.0%	0	0.0%
Oil	0	0.0%	0	0.0%
Renewable	253	13.3%	654	32.7%
Interchange	0	0.0%	0	0.0%
NUG & Other	86	4.5%	68	3.4%
Total	1,903		1,997	

Source: 2025 TYSP and Data Responses

Reliability Requirements

GRU utilizes a 15 percent planning reserve margin criterion for seasonal peak demand. Figure 35 displays the forecast planning reserve margin for GRU through the planning period for both seasons. As shown in the figure, GRU's generation needs are controlled by its summer peak throughout the planning period.

Figure 35: GRU Reserve Margin Forecast



Source: 2025 TYSP

Generation Resources

GRU currently plans on retiring three natural gas-fired units, as described in Table 21. All three units, a pair of combustion turbines and a steam turbine, are located at GRU's Deerhaven plant.

Table 21: GRU Generation Resource Changes

Year	Plant Name & Unit Number	Unit Type	Net Capacity (MW)	Notes
			Sum	
Retiring Units				
2027	Deerhaven Unit FS01	ST NG	76	
2031	Deerhaven Unit GT01 & GT02	GT NG	35	2 Units
Total Retirements			111	
New Units				
	None			
Total New Units			0	
Net Additions			(111)	

Source: 2025 TYSP

JEA

JEA, formerly known as Jacksonville Electric Authority, is Florida's largest municipal utility and fifth largest electric utility. JEA's service territory is within the FRCC region, and includes all of Duval County as well as portions of Clay and St. Johns Counties. As a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds JEA's 2025 TYSP suitable for planning purposes.

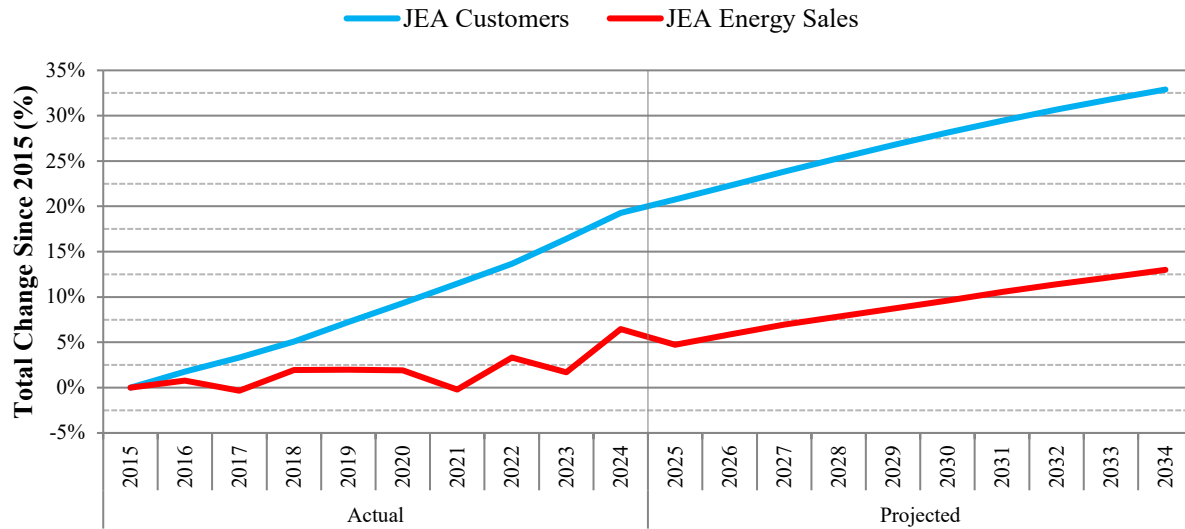
Load & Energy Forecasts

In 2024, JEA had approximately 527,491 customers and annual retail energy sales of 12,873 GWh, accounting for approximately 5.2 percent of Florida's annual retail energy sales. Over the last 10 years, JEA's customer base has increased by approximately 19.3 percent, while retail energy sales have increased by approximately 6.5 percent.

JEA indicated that the utility-funded DSM programs continue to be a contributor to the decrease in residential UPC. The other contributing factors include customer behavioral changes, increased electric rates, and more multifamily housing construction (such housing features lower UPC compared to single-family housing). The Utility noted that the U.S. Government's SEER Requirement Changes for 2015 requiring new split system central air conditioners to be a minimum 14 SEER was the primary reason for the decrease in electricity UPC in years subsequent to the new standard. The Utility further indicated that the new 2023 SEER rating standards, now requiring new air conditioners in southern states to be a minimum 15 SEER, will continue to contribute to the decrease in electricity UPC. For the 2025 TYSP forecasting horizon, JEA expects that residential UPC will stay flat with an average growth rate of 0.4 percent, commercial UPC will decrease by 1.1 percent per year, and industrial UPC will decrease by 0.2 percent per year.

For the next 10 years, JEA's customer base is forecasted to grow at an average annual rate of 1.1 percent; while its retail energy sales are projected to increase at an average annual rate of 0.9 percent. Figure 36 illustrates historic and prospective forecasted growth rates in customers and retail energy sales for the resource plan that JEA filed in its 2025 TYSP.

Figure 36: JEA Growth



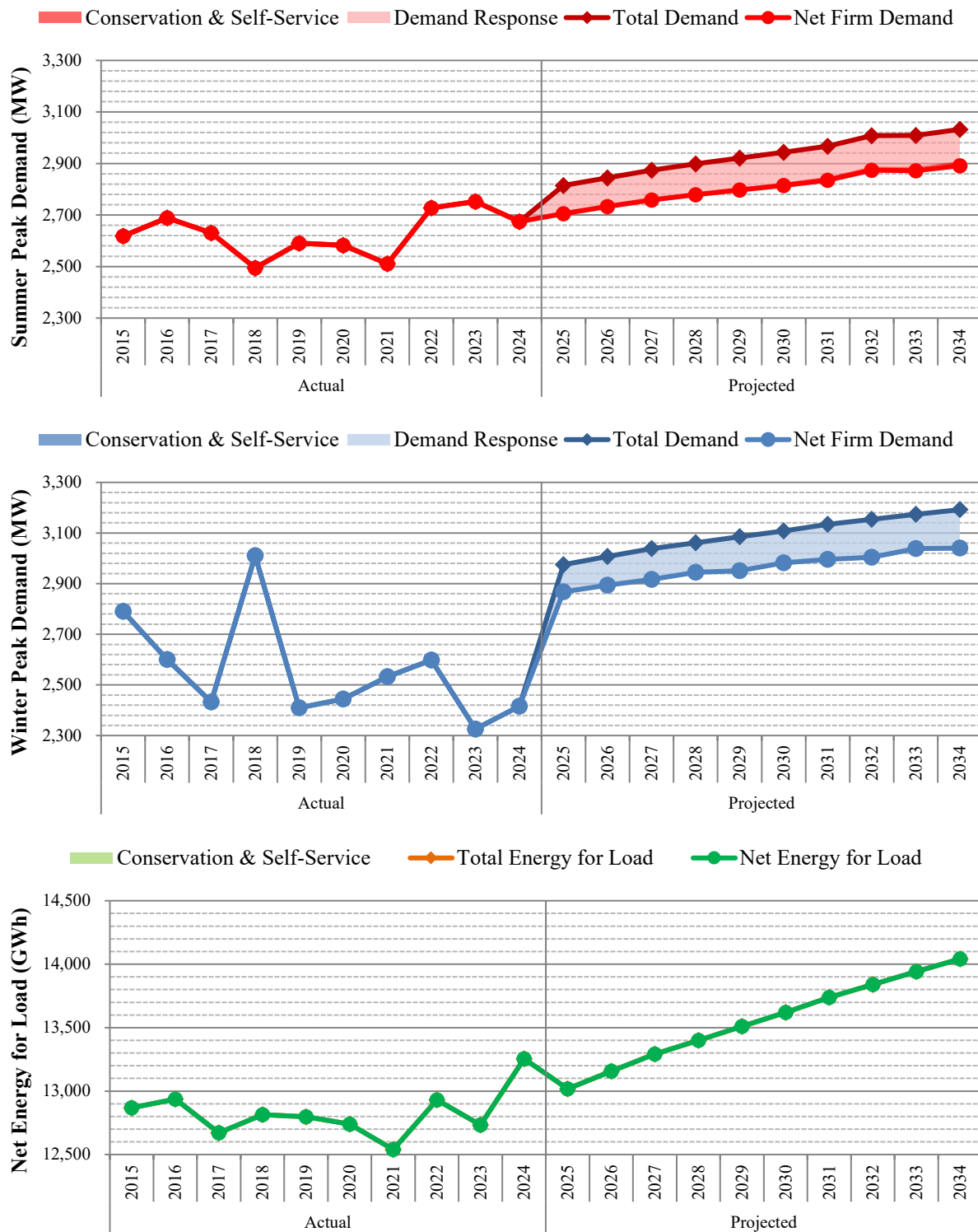
Source: 2025 TYSP

The three graphs in Figure 37 show JEA’s seasonal peak demand and net energy for load for the historic years of 2015 through 2024 and forecast years 2025 through 2034. Even though JEA is a municipal utility, it is subject to FEECA and currently offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. These graphs include the full impact of DSM, and assume that all available demand response resources will be activated during the seasonal peak. The Commission reviewed and established energy conservation goals for JEA and approved JEA’s 2025-2034 DSM Plan.^{19,20} In preparing its 2025 TYSP seasonal peak demand and energy forecasts, JEA reflects these Commission-approved FEECA goals through the forecast period (through 2034), as shown in Figure 37.

¹⁹ Order No. PSC-2024-0432-FOF-EG, issued September 20, 2024, in Docket No. 20240016-EI, *In re: Commission review of numeric conservation goals (JEA)*.

²⁰ Order No. PSC-2025-0094-PAA-EG, issued March 24, 2025, in Docket No. 20240167-EG, *In re: Petition for approval of demand-side management plan, by JEA*.

Figure 37: JEA Demand and Energy Forecasts



Source: 2025 TYSP

Fuel Diversity

Table 22 shows JEA's actual net energy for load by fuel type as of 2024 and the projected fuel mix for 2034. While natural gas was the dominant fuel source in 2024, purchases from other utilities, through the Interchange, was JEA's second most utilized energy source. JEA has the highest percentage of energy from other utilities, primarily from a contract with the Municipal Electric Authority of Georgia for 200 MW from the Vogtle nuclear Units 3 and 4. JEA is projected to reduce its Interchange purchases from approximately 28 percent in 2024 to 15 percent in 2034, primarily offset by an increase in renewables, which will represent 20 percent of energy by 2034.

Table 22: JEA Energy Generation by Fuel Type

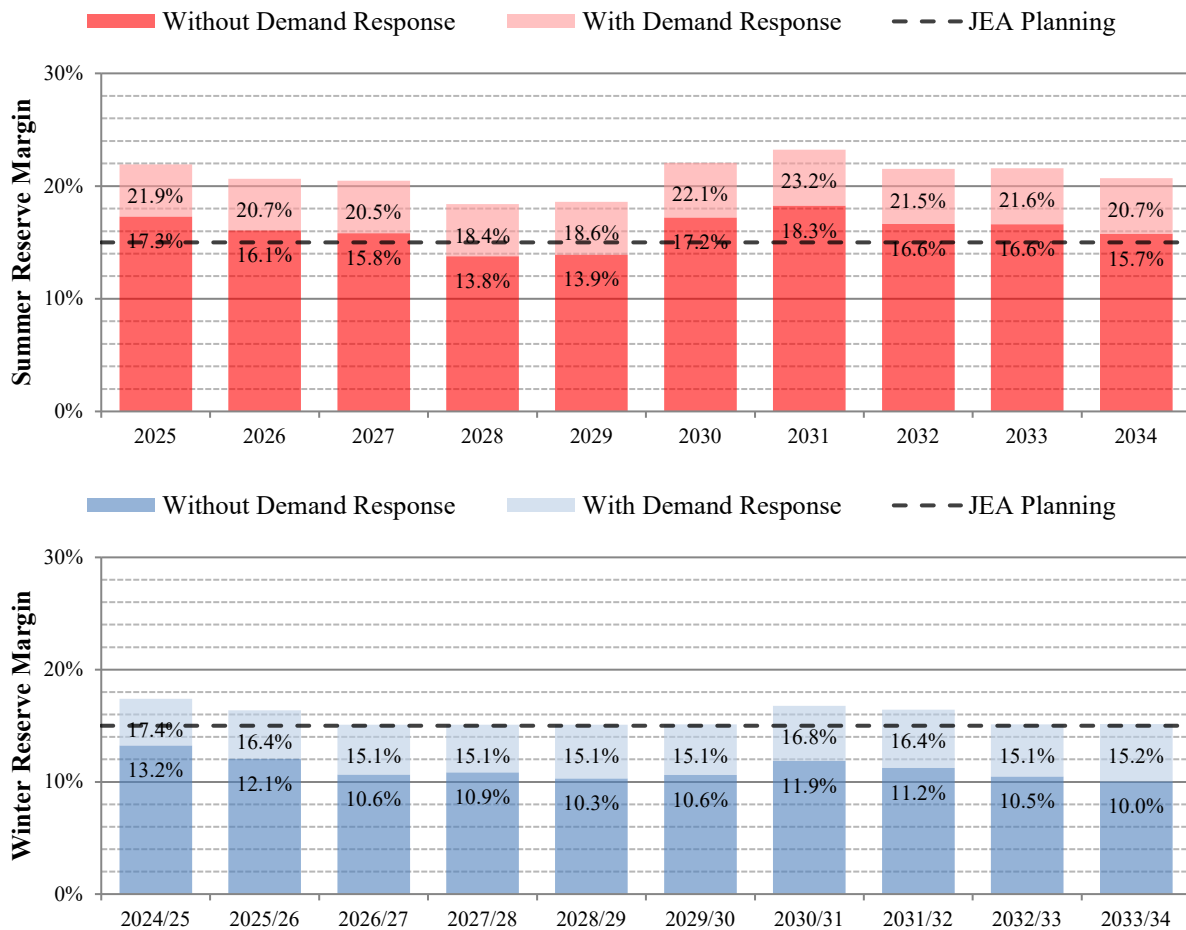
Fuel Type	Net Energy for Load			
	Actual 2024		Projected 2034	
	GWh	%	GWh	%
Natural Gas	8,257	62.3%	8,172	58.2%
Coal	774	5.8%	986	7.0%
Nuclear	0	0.0%	0	0.0%
Oil	8	0.1%	9	0.1%
Renewable	507	3.8%	2,832	20.2%
Interchange	3,676	27.7%	2,044	14.6%
NUG & Other	32	0.2%	0	0.0%
Total	13,254		14,043	

Source: 2025 TYSP and Data Responses

Reliability Requirements

JEA utilizes a 15 percent planning reserve margin criterion for seasonal peak demand. Figure 38 displays the forecast planning reserve margin for JEA through the planning period for both seasons, with and without the use of demand response. JEA's current and planned PPA with solar generators contribute to this shift in planning because solar resources provide coincident capacity during the summer peak but not the winter peak. Over the planning horizon, JEA's winter reserve margin is lower than its summer reserve margin.

Figure 38: JEA Reserve Margin Forecast



Source: 2025 TYSP

Generation Resources

JEA projects one unit retirement and one unit addition during the planning period, as described in Table 23. JEA plans on retiring Northside Unit 3 and adding an unnamed natural gas-fired combined cycle unit in 2030. The unnamed combined cycle would be subject to PPSA approval and it is anticipated a filing with the Commission would occur in 2026. JEA also includes in its resource planning PPAs with 18 solar facilities totaling 1,129 MW, including 2 with collocated batteries totaling 100 MW, over the planning period.

Table 23: JEA Energy Generation by Fuel Type

Year	Plant Name & Unit Number	Unit Type	Net Capacity (MW)	Notes
			Sum	
Retiring Units				
2030	Northside Unit 3	ST NG	524	
Total Retirements			524	
New Units				
2030	Advanced-Class 1x1 CC	CC NG	576	PPSA Approval Needed
Total New Units			576	
Net Additions			52	

Source: 2025 TYSP

Lakeland Electric (LAK)

LAK is a municipal utility and the state's third smallest electric utility required to file a TYSP. The Utility's service territory is within the FRCC region and consists of the City of Lakeland and surrounding areas. As a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds LAK's 2025 TYSP suitable for planning purposes.

Load & Energy Forecasts

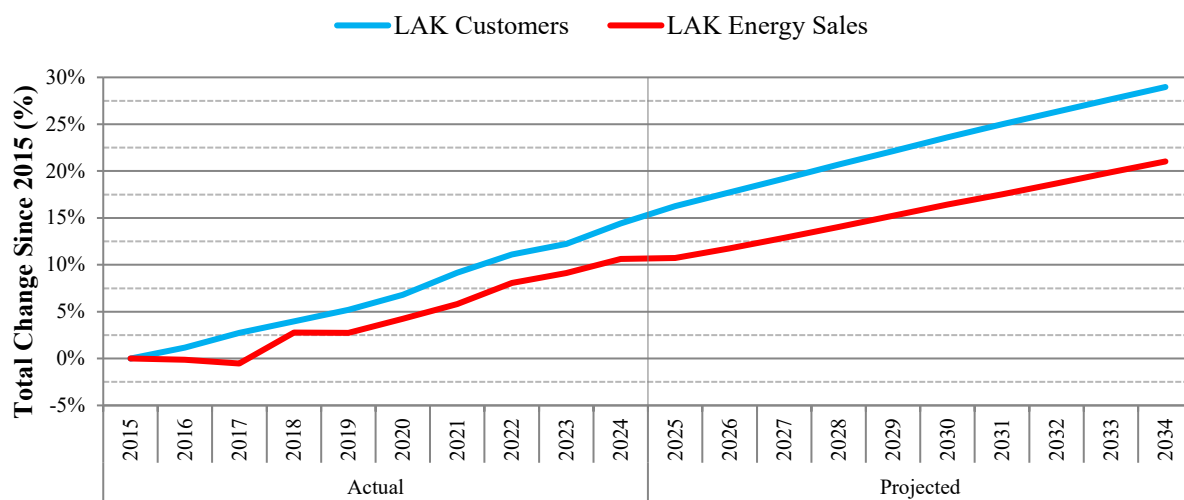
In 2024, LAK had approximately 143,790 customers and annual retail energy sales of 3,356 GWh, accounting for approximately 1.4 percent of Florida's annual retail energy sales. In the same year, the Utility's total customer growth and total retail sales growth were approximately 1.9 percent and 1.4 percent, respectively. Historically, the Utility has experienced a steady growth in residential and commercial customers due to a rise in population in the Lakeland area. The number of industrial customers are relatively stable with most industry being manufacturing or distribution centers. Over the last 10 years, LAK's customer base has increased by 14.4 percent, while retail energy sales have grown by approximately 10.6 percent.

LAK's residential UPC has slightly increased as more customers continue to work from home, leading to higher daytime energy consumption which is an ongoing trend that emerged following the COVID-19 pandemic. Both LAK's commercial and industrial UPCs decreased slightly which is attributed to energy efficient buildings and appliances. Additionally, customer's movement to rooftop solar has contributed in offsetting the energy usage from the grid. LAK projects that the UPC of each rate class and the total UPC will continue to decrease, and perceived that the factors contributing to the decline is appliance efficiency improvement and new homes being built to be more efficient.

For the next 10 years, LAK's forecasts indicate that its number of customers are projected to grow at an average annual rate of approximately 1.2 percent, and its retail energy sales are projected to grow at an average annual rate of approximately 1.0 percent. The Utility identified the factors contributing to the growth of sales are continuous population increase and economic development. Also contributing to the sales growth is the warmer weather expected.

Figure 39 illustrates historic and prospective forecasted growth rates in customers and retail energy sales for the resource plan that LAK filed in its 2025 TYSP.

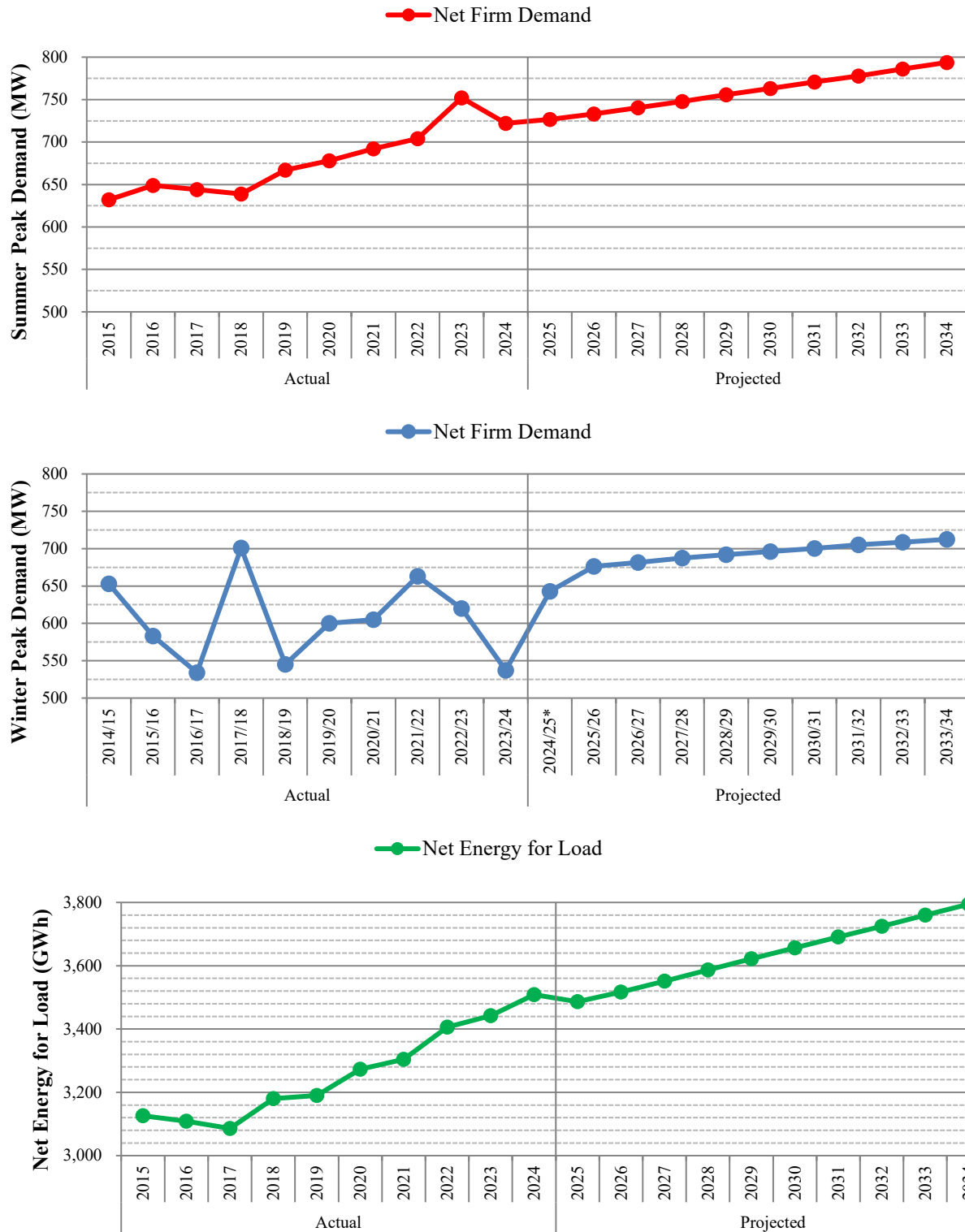
Figure 39: LAK Growth



Source: 2025 TYSP

The three graphs in Figure 40 show LAK's seasonal peak demand and net energy for load for the historic years of 2015 through 2024 and forecast years 2025 through 2034. LAK offers energy efficiency programs, the impacts of which are included in the graphs.

Figure 40: LAK Demand and Energy Forecasts



Source: 2025 TYSP

Fuel Diversity

Table 24 shows LAK's actual net energy for load by fuel type as of 2024 and the projected fuel mix for 2034. LAK uses natural gas as its primary fuel type for energy, 75 percent in 2024, with purchases (listed in the NUG & Other category) representing 24 percent net energy for load, and the remaining 1 percent from renewables. By 2034, natural gas is expected to be reduced to 64 percent, offset by purchases and renewables, which would represent 31 and 5 percent, respectively. LAK, in the actual and projected period, is the utility most reliant upon energy purchases.

Table 24: LAK Energy Generation by Fuel Type

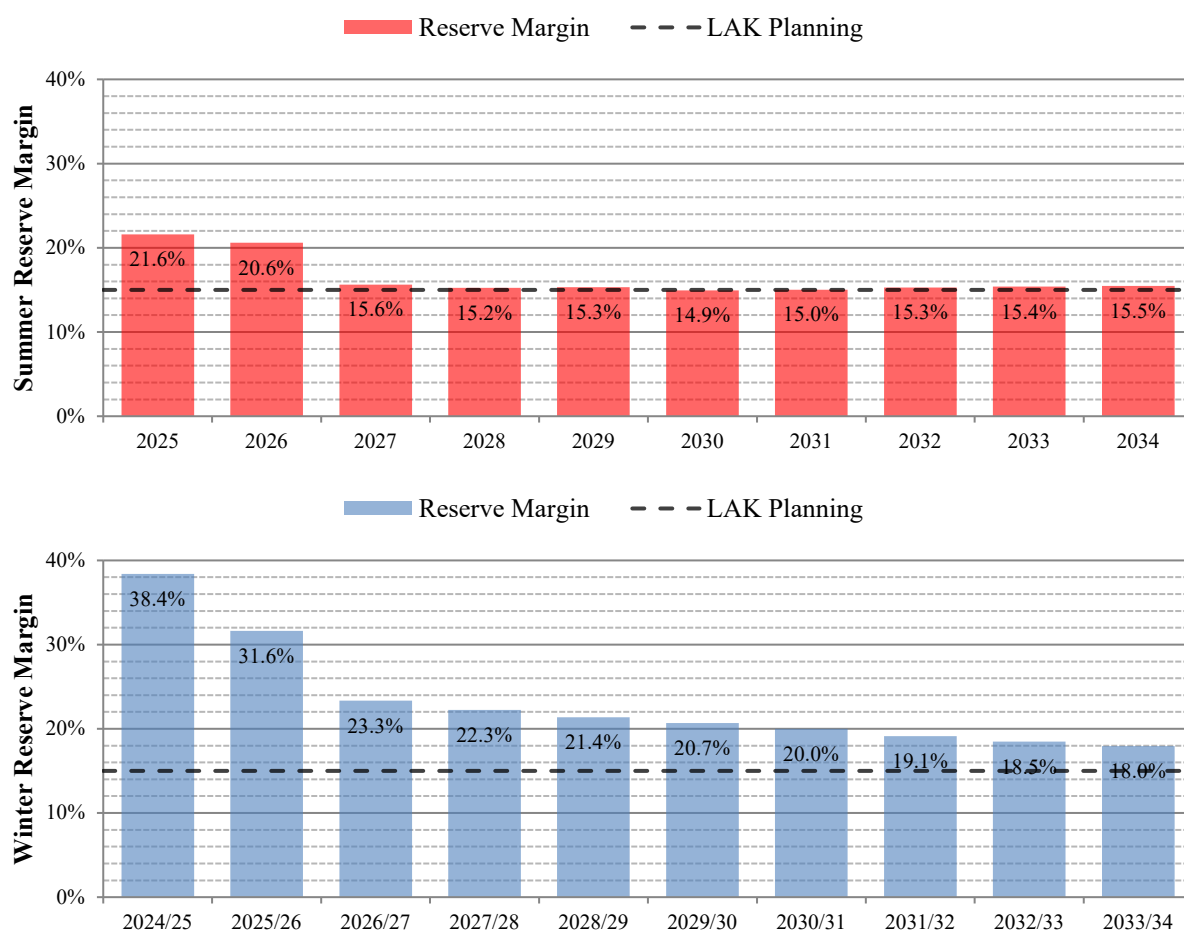
Fuel Type	Net Energy for Load			
	Actual 2024		Projected 2034	
	GWh	%	GWh	%
Natural Gas	2,643	75.3%	2,408	63.5%
Coal	0	0.0%	0	0.0%
Nuclear	0	0.0%	0	0.0%
Oil	0	0.0%	0	0.0%
Renewable	28	0.8%	194	5.1%
Interchange	0	0.0%	0	0.0%
NUG & Other	838	23.9%	1,192	31.4%
Total	3,509		3,794	

Source: 2025 TYSP and Data Responses

Reliability Requirements

LAK utilizes a 15 percent planning reserve margin criterion for seasonal peak demand. Figure 41 displays the forecast planning reserve margin for LAK through the planning period for both seasons. LAK does not offer demand response programs at this time. As illustrated by Figure 41, summer peak demand is the controlling factor for reliability planning for almost all years of the planning period.

Figure 41: LAK Reserve Margin Forecast



Source: 2025 TYSP

Generation Resources

LAK projects three unit additions during the planning period, as described by Table 25. The additions are all natural gas-fired internal combustion engines, with a capacity of 20 MW and an in-service date of 2025. Three similar units entered service in 2024. LAK is in negotiations for a PPA with Edge Solar for a 74.8 MW solar facility by 2026. None of these additions requires a need determination pursuant to the PPSA.

Table 25: LAK Generation Resource Changes

Year	Plant Name & Unit Number	Unit Type	Net Capacity (MW)	Notes
			Sum	
Retiring Units				
	None			
Total Retirements			0	
New Units				
2025	McIntosh Units MREP 1-3	IC NG	60	3 Units
Total New Units			60	
Net Additions			60	

Source: 2025 TYSP and Data Responses

Orlando Utilities Commission (OUC)

OUC is a municipal utility and Florida's sixth largest electric utility and second largest municipal utility. The Utility's service territory is within the FRCC region and primarily consists of the Orlando metropolitan area. As a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds OUC's 2025 TYSP suitable for planning purposes.

Load & Energy Forecasts

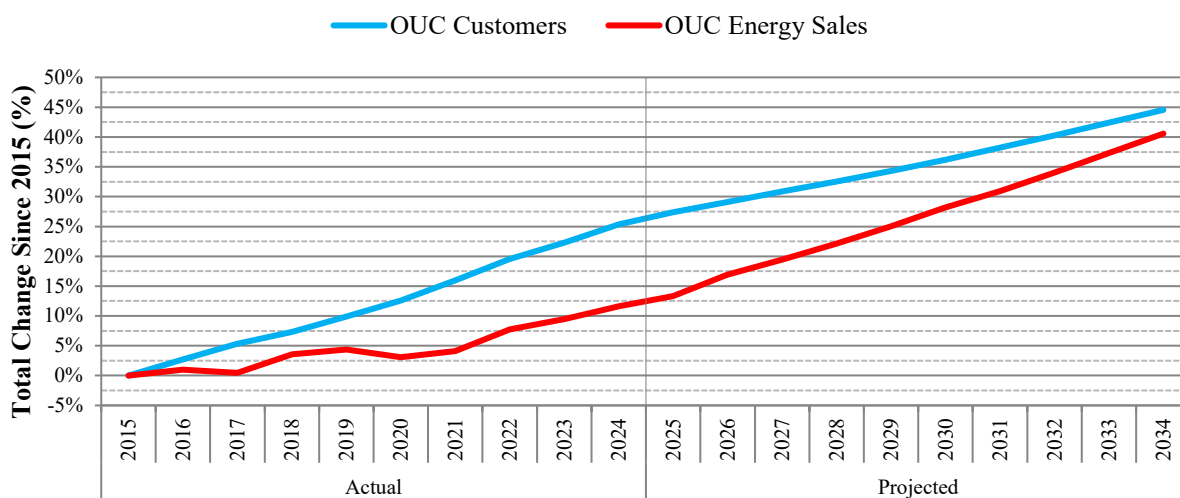
In 2024, OUC had approximately 282,179 customers and annual retail energy sales of 7,295 GWh, accounting for approximately 3.0 percent of Florida's annual retail energy sales. Over the last 10 years, OUC's customer base has increased by 25.4 percent, while its retail energy sales have increased by 11.6 percent, approximately.

OUC acknowledged that over the past 10 years, its UPC has been essentially flat for both the residential and commercial customer segments. For the next 10 years, OUC's residential UPC is expected to grow 1.9 percent annually. The main driver of this increase is the projected adoption of EVs. The Utility's commercial UPC is expected to grow 1.2 percent annually. This increase is driven by large customer expansions which increase overall commercial sales.

Over the forecast horizon, OUC is projecting growth in the number of customers at an average annual rate of 1.4 percent, and growth in retail energy sales at an average annual rate of 2.4 percent, approximately. The Utility indicates that this projected increase is driven by large commercial expansions and residential EV adoption.

Figure 42 illustrates historic and prospective forecasted growth rates in customers and retail energy sales for the resource plan that OUC filed in its 2025 TYSP.

Figure 42: OUC Growth



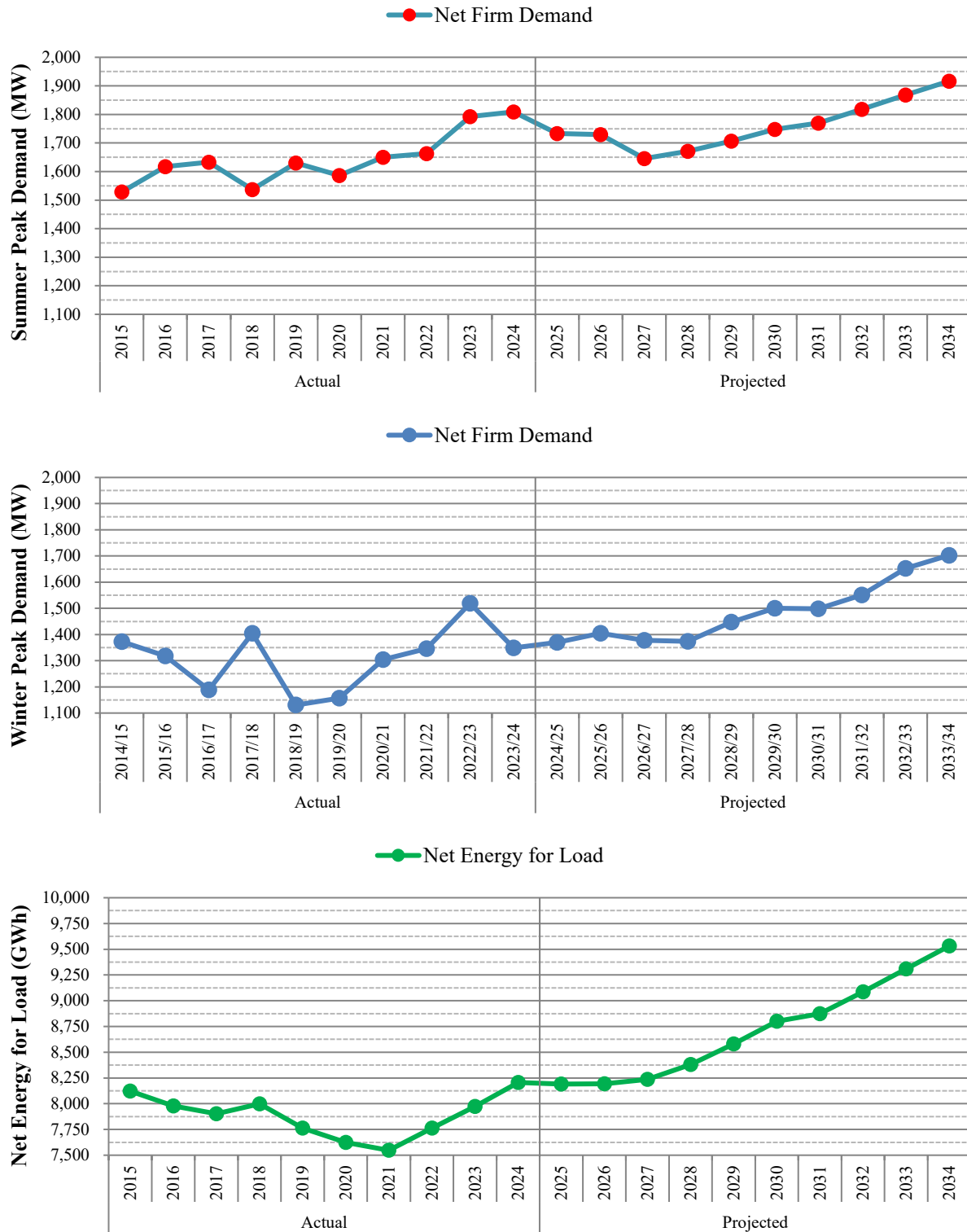
Source: 2025 TYSP

The three graphs in Figure 43 show OUC’s seasonal peak demand and net energy for load for the historic years of 2015 through 2024 and forecast years 2025 through 2034. These graphs include the impact of the Utility’s DSM programs. While a municipal utility, OUC is subject to FEECA and currently offers energy efficiency programs to customers to reduce peak demand and annual energy consumption. The Commission reviewed and established energy conservation goals for OCU and approved OUC’s 2025-2034 DSM Plan.^{21,22} In preparing its 2025 TYSP seasonal peak demand and energy projects, OUC reflects these Commission-approved FEECA goals will be extended through the forecast period (through 2034), as shown in Figure 43.

²¹ Order No. PSC-2024-0433-FOF-EG, issued September 20, 2024, in Docket No. 20240017-EI, *In re: Commission review of numeric conservation goals (Orlando Utilities Commission)*.

²² Order No. PSC-2025-0086-PAA-EG, issued March 24, 2025, in Docket No. 20240166-EG, *In re: Petition for approval of 2025 demand-side management plan, by Orlando Utilities Commission*.

Figure 43: OUC Demand and Energy Forecasts



Source: 2025 TYSP

Fuel Diversity

Table 26 shows OUC's actual net energy for load by fuel type as of 2024 and the projected fuel mix for 2034. In 2024, approximately 70 percent of OUC's net energy for load was met with natural gas, while coal, the second most-used fuel, met approximately 20 percent of the demand. By 2034, OUC will be one of three utilities, along with FPL and GRU, to use natural gas for less than half of its energy generation, and the only utility to use renewable energy for a majority of its energy generation.

Table 26: OUC Energy Generation by Fuel Type

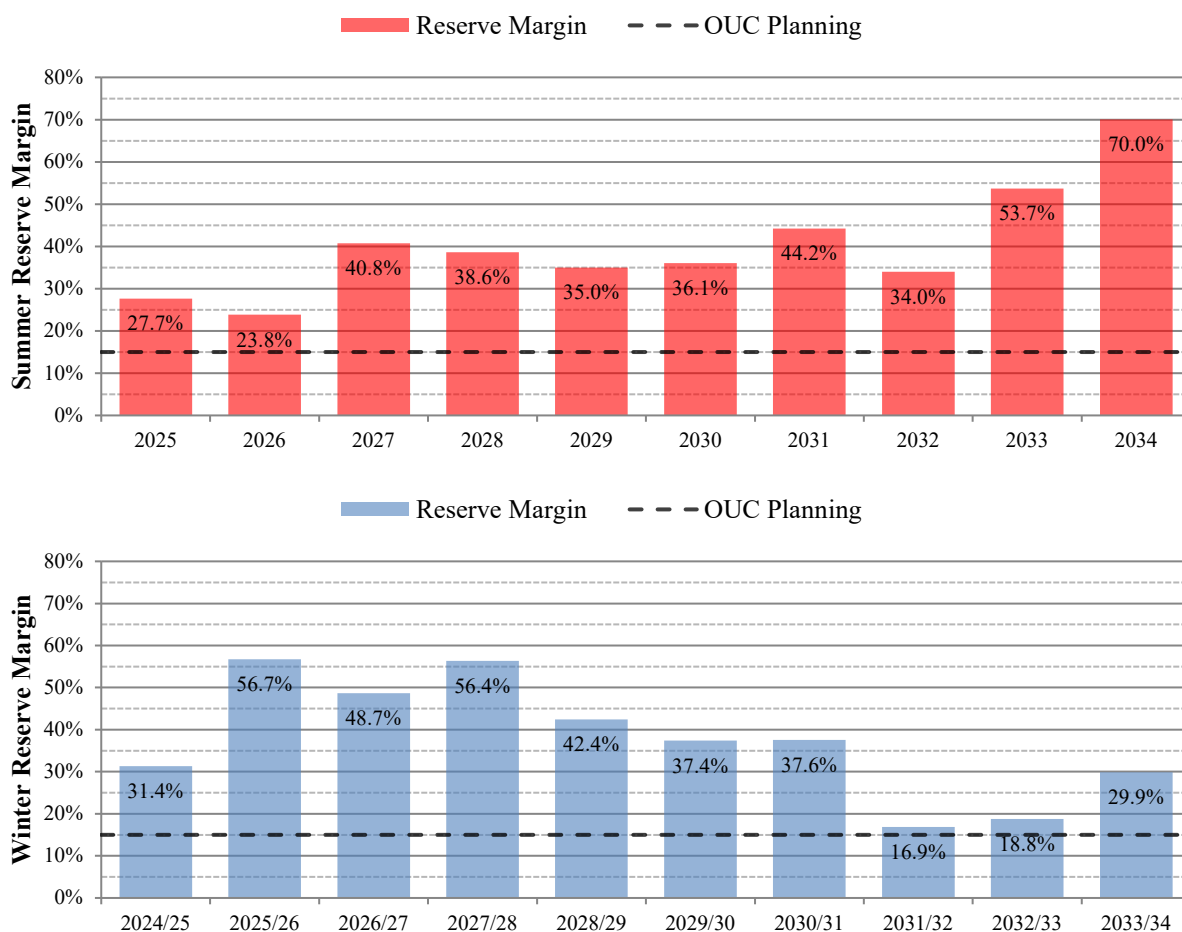
Fuel Type	Net Energy for Load			
	Actual 2024		Projected 2034	
	GWh	%	GWh	%
Natural Gas	5,753	70.1%	4,230	44.4%
Coal	1,608	19.6%	0	0.0%
Nuclear	433	5.3%	511	5.4%
Oil	4	0.0%	0	0.0%
Renewable	408	5.0%	4,791	50.3%
Interchange	0	0.0%	0	0.0%
NUG & Other	0	0.0%	0	0.0%
Total	8,206		9,532	

Source: 2025 TYSP and Data Responses

Reliability Requirements

OUC utilizes a 15 percent planning reserve margin criterion for seasonal peak demand. Figure 44 displays the forecast planning reserve margin for OUC through the planning period for both seasons, including the impact of DSM programs. As shown in the figure, OUC's generation needs are controlled by its summer peak demand.

Figure 44: OUC Reserve Margin Forecast



Source: 2025 TYSP

Generation Resources

OUC projects one unit retirement during the planning period, as described in Table 27. OUC plans on retiring Stanton Energy Center Unit 1, a jointly owned unit with FMPA and other utilities, in 2025. OUC is also converting its last remaining coal-fired Stanton Energy Center Unit 2 to a natural gas-fired unit in 2028. Transmission upgrades planned for 2025 and 2026 will allow OUC full access to the firm capacity of its existing three natural gas-fired combustion turbines acquired from the Osceola merchant plant, for a total of 471 MW. OUC also includes in its resource planning PPAs with several solar and battery facilities, including a total of 1,490 MW of solar and 800 MW of batteries over the planning period.

Table 27: OUC Generation Resource Changes

Year	Plant Name & Unit Number	Unit Type	Net Capacity (MW)	Notes
			Sum	
Retiring Units				
2025	Stanton Energy Center Unit 1	ST BIT	311	Jointly Owned Unit
Total Retirements			311	
New Units				
	None			
Total New Units			0	
Net Additions			(311)	

Source: 2025 TYSP

Seminole Electric Cooperative (SEC)

SEC is a generation and transmission rural electric cooperative that serves its member distribution cooperatives and is collectively Florida's fourth largest utility. SEC's generation and member cooperatives are within the FRCC region, with member cooperatives located in central and north Florida. As a rural electric cooperative, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds SEC's 2025 TYSP suitable for planning purposes.

Load & Energy Forecasts

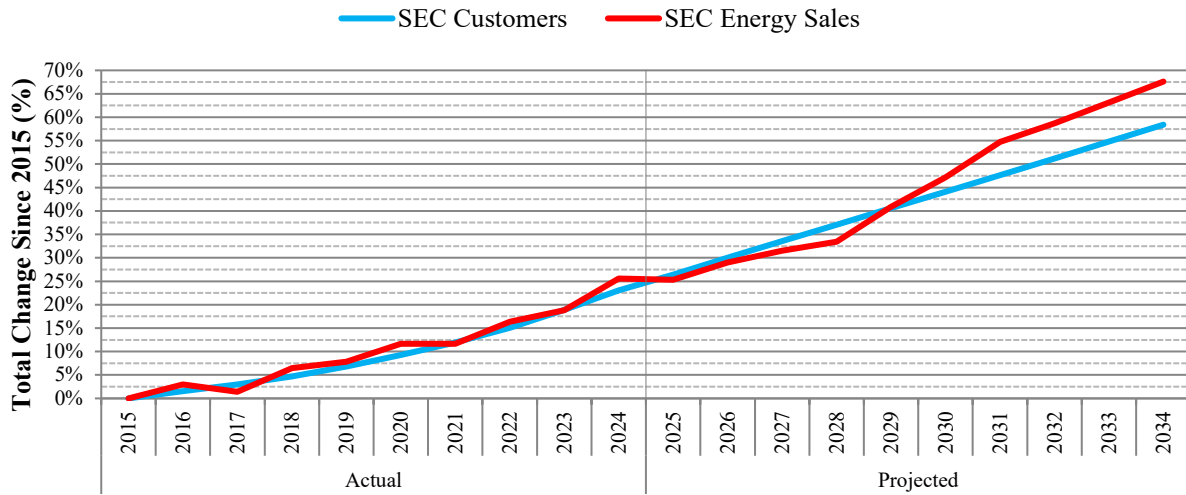
In 2024, SEC member cooperatives had approximately 925,329 customers and annual retail energy sales of 16,792 GWh, accounting for approximately 6.8 percent of Florida's annual retail energy sales. Over the last 10 years, SEC's customer base has increased by 23.1 percent, while its retail energy sales have increased by approximately 25.6 percent.

Over the past 10 years, for SEC's combined members (hereinafter the Membership), average UPC has remained relatively stable, with the residential sector increasing annually by 0.3 percent on average, and the commercial sector decreasing annually by 0.4 percent on average. These trends reflect the widespread adoption of more efficient residential and commercial appliances and equipment. For the next 10 years, across the Membership, the UPC is expected to increase by 2.4 percent annually in average, with diverging trends by customer type. Residential UPC is expected to decrease by 0.9 percent and commercial UPC is expected to increase by 3.2 percent annually. The forecasted slight decline in residential UPC is due primarily to the continued replacement of older appliances and equipment with more energy-efficient models. In contrast, the projected increase in commercial UPC is due to the expectation of more energy-intensive customers, which offset any efficiency-driven declines.

Over the current 10-year forecast horizon, SEC is projecting an average annual growth rate in its customer base of 2.5 percent. The major factors contributing to the growth are continued positive net migration and growth in regional housing. SEC's projected average annual growth rate in retail energy sales is 3.3 percent.

Figure 45 illustrates historic and prospective forecasted growth rates in customers and retail energy sales for the resource plan that SEC filed in its 2025 TYSP.

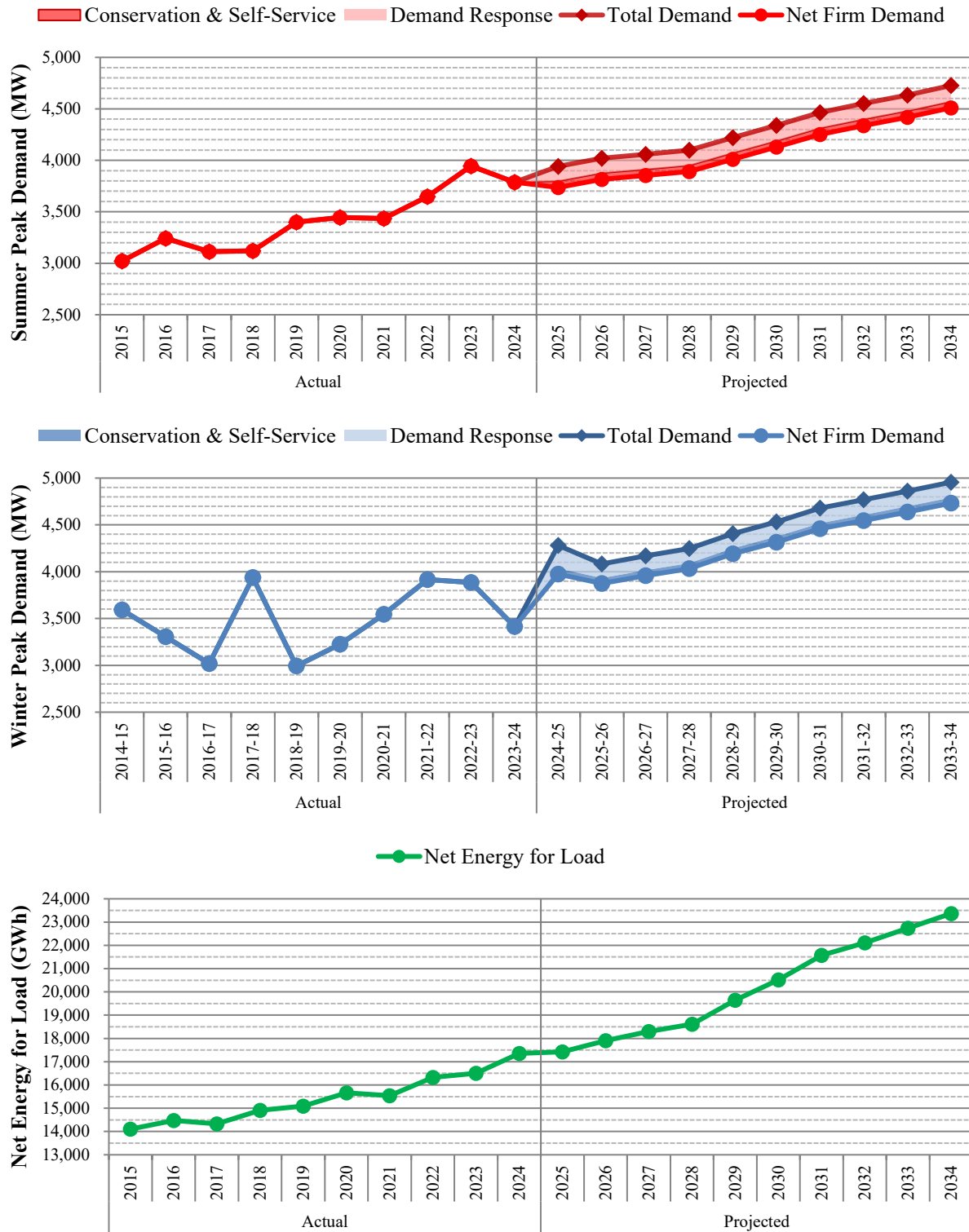
Figure 45: SEC Growth



Source: 2025 TYSP

The three graphs in Figure 46 show SEC’s seasonal peak demand and net energy for load for the historic years 2015 through 2024 and forecast years 2025 through 2034. As SEC is a generation and transmission company, it does not directly engage in energy efficiency or demand response programs. Member cooperatives do offer DSM programs, the impacts of which are included in Figure 46.

Figure 46: SEC Demand and Energy Forecasts



Source: 2025 TYSP

Fuel Diversity

Table 28 shows SEC's actual net energy for load by fuel type as of 2024 and the projected fuel mix for 2034. In 2024, natural gas was SEC's primary fuel, at 62 percent, with purchases making up approximately 20 percent, the second highest in the state. During the planning period, SEC is projected to increase its self-generation, primarily of natural gas, offsetting these purchases and coal generation. By 2034, natural gas will represent approximately 85 percent of SEC's fuel usage.

Table 28: SEC Energy Generation by Fuel Type

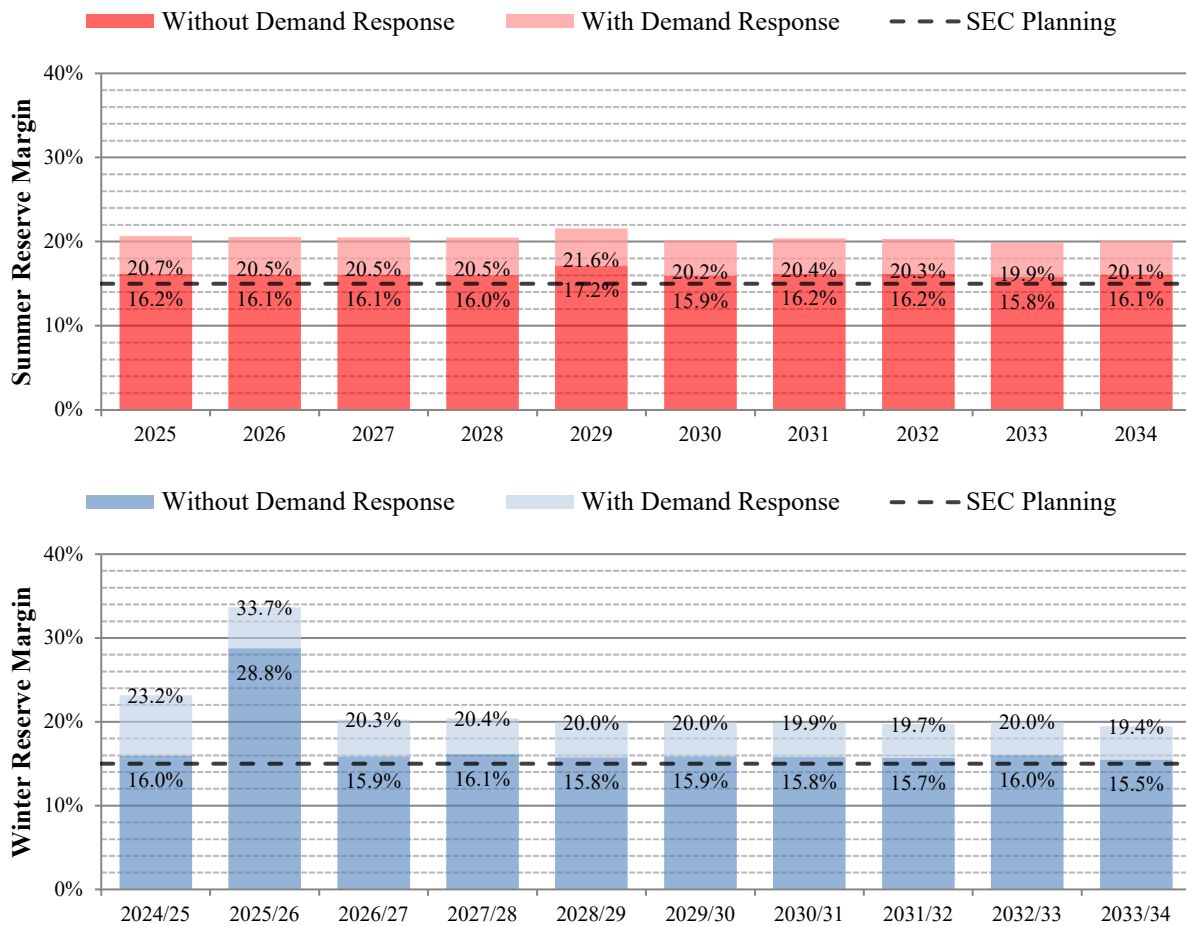
Fuel Type	Net Energy for Load			
	Actual 2024		Projected 2034	
	GWh	%	GWh	%
Natural Gas	10,840	62.4%	19,781	84.6%
Coal	2,197	12.7%	1,965	8.4%
Nuclear	0	0.0%	0	0.0%
Oil	14	0.1%	6	0.0%
Renewable	383	2.2%	703	3.0%
Interchange	455	2.6%	0	0.0%
NUG & Other	3,470	20.0%	913	3.9%
Total	17,359		23,368	

Source: 2025 TYSP and Data Responses

Reliability Requirements

SEC utilizes a 15 percent planning reserve margin criterion for seasonal peak demand. Figure 47 displays the forecast planning reserve margin for SEC through the planning period for both seasons, with and without the use of demand response. Member cooperatives allow SEC to coordinate demand response resources to maintain reliability. As shown in the figure, SEC's generation needs are determined by winter peak demand more often than summer peak demand during the planning period.

Figure 47: SEC Reserve Margin Forecast



Source: 2025 TYSP

Generation Resources

SEC projects four unit additions during the planning period, as described by Table 29. All are natural gas-fired units, including two combined cycle and two simple cycle combustion turbines. The first combined cycle, the Shady Hills Energy Center in 2026, has already received PPSA approval by the Commission. The second combined cycle has a capacity of 559 MW, with an estimated in-service date of 2032. This unnamed combined cycle unit would be subject to PPSA approval and it is anticipated a filing with the Commission would occur in 2028.

Table 29: SEC Generation Resource Changes

Year	Plant Name & Unit Number	Unit Type	Net Capacity (MW)	Notes
			Sum	
Retiring Units				
	None			
Total Retirements			0	
New Units				
2026	Shady Hills Energy Center Unit 1	NG CC	546	PPSA Approved
2028	Unnamed CT	NG CT	393	
2030	Unnamed CT	NG CT	393	
2032	Unnamed CC	NG CC	559	PPSA Approval Needed
Total New Units			1,891	
Net Additions			1,891	

Source: 2025 TYSP

City of Tallahassee Utilities (TAL)

TAL is a municipal utility and the second smallest electric utility by sales that files a TYSP. The Utility's service territory is within the FRCC region and primarily consists of the City of Tallahassee and surrounding areas. As a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds TAL's 2025 TYSP suitable for planning purposes.

Load & Energy Forecasts

In 2024, TAL had approximately 124,241 customers and annual retail energy sales of 2,788 GWh, or approximately 1.1 percent of Florida's annual retail energy sales. Over the last 10 years, TAL's customer base has increased by approximately 5.4 percent, while retail energy sales have increased by approximately 5.0 percent.

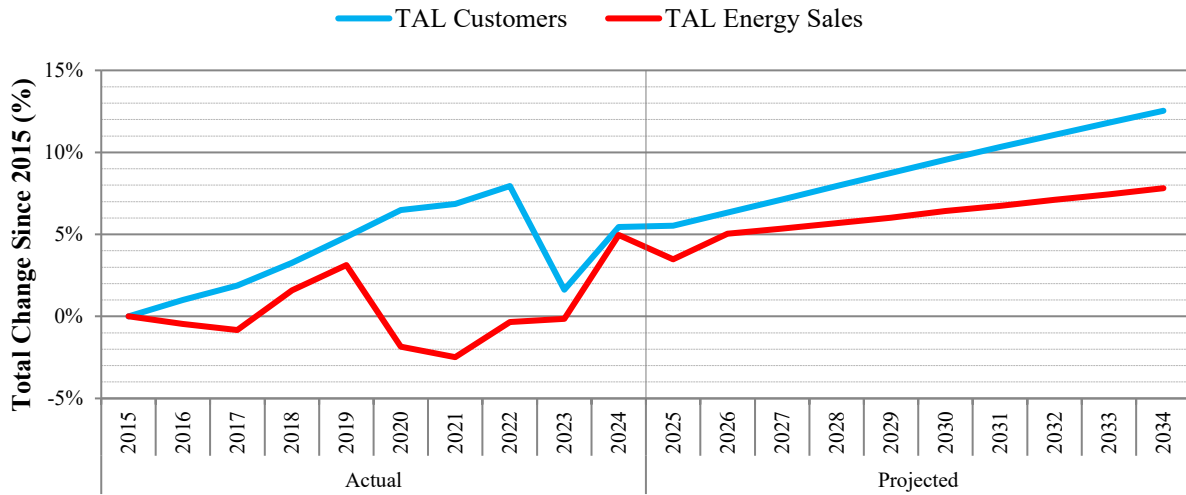
TAL noticed that, historically, both its residential and commercial UPC fluctuated slightly year-to-year but remained relatively steady over the 10-year period with one exception: a noticeable decrease for commercial customers in the year or two following the COVID-19 pandemic. Other major factors affecting UPC included growth in electrification (e.g., EV, customer-owned solar generation), market-driven efficiencies from upgrading HVAC, DSM incentives, and weather anomalies. Looking forward, TAL predicts that planning period trends in residential UPC will closely match the historical trends. The Utility indicates that the underlying economic factors that influence commercial growth in the planning period are often at odds with the gains from DSM and market-driven efficiencies. TAL is forecasting increased commercial activity, which will result in an increase in the commercial UPC, even with a slight offset from efficiency measures. The resulting trend in commercial UPC is increasing in the near future and then decreasing in later years as market-driven efficiencies and DSM measures build momentum over time.

In 2024, TAL's total customer growth and total retail sales growth are approximately 3.8 percent and 5.1 percent, respectively. Over the current forecast horizon, TAL is projecting an average annual growth rate of approximately 0.7 percent in its total customers, and an average annual growth rate of approximately 0.5 percent in its annual retail energy sales.

In 2023, TAL implemented new customer billing software, which changed the methodology of accounting for customer types and consolidated some service points. The resulting data anomaly showed an increase in average residential consumption, a decrease in average commercial consumption, and an overall reduction in service points. Since the software implementation is now complete, the Utility noted that its data collection issues should not persist on a going-forward basis. However, TAL indicates that with 2023 data remaining in the Utility's historical data as a step change, this anomaly or non-weather event-caused step change will continue to be noted in future reports.

Figure 48 illustrates historic and prospective forecasted growth rates in customers and retail energy sales for the resource plan that TAL filed in its 2025 TYSP.

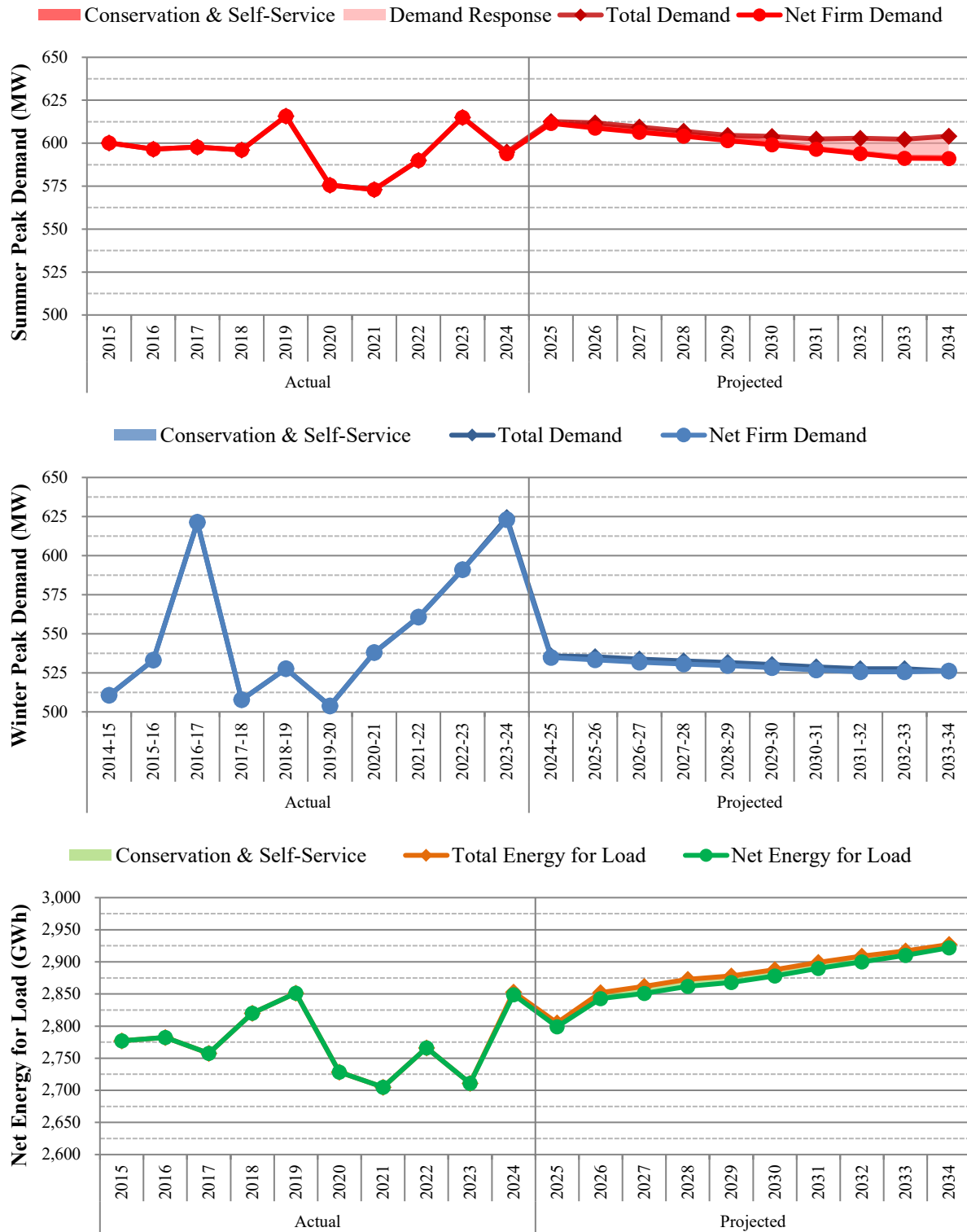
Figure 48: TAL Growth



Source: 2025 TYSP

The three graphs in Figure 49 show TAL's seasonal peak demand and net energy for load for the historic years of 2015 through 2024 and forecast years 2025 through 2034. These graphs include the impact of DSM, and for future years reflect that all available demand response resources will be activated during the seasonal peak. TAL offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. Currently, TAL only offers demand response programs that target appliances contributing to summer peak, and therefore have no effect upon winter peak.

Figure 49: TAL Demand and Energy Forecasts



Source: 2025 TYSP

Fuel Diversity

Table 30 shows TAL's actual net energy for load by fuel type as of 2024 and the projected fuel mix for 2034. TAL relies almost exclusively on natural gas for its generation, excluding some purchases from other utilities and QF. In 2024, TAL produced more energy than required for its native load and was a net exporter by approximately 8 percent, primarily of off-peak power during shoulder months due to its generation's operating characteristics. Natural gas is anticipated to remain the primary fuel source on the system and TAL will continue to be a net exporter of energy throughout the period.

Table 30: TAL Energy Generation by Fuel Type

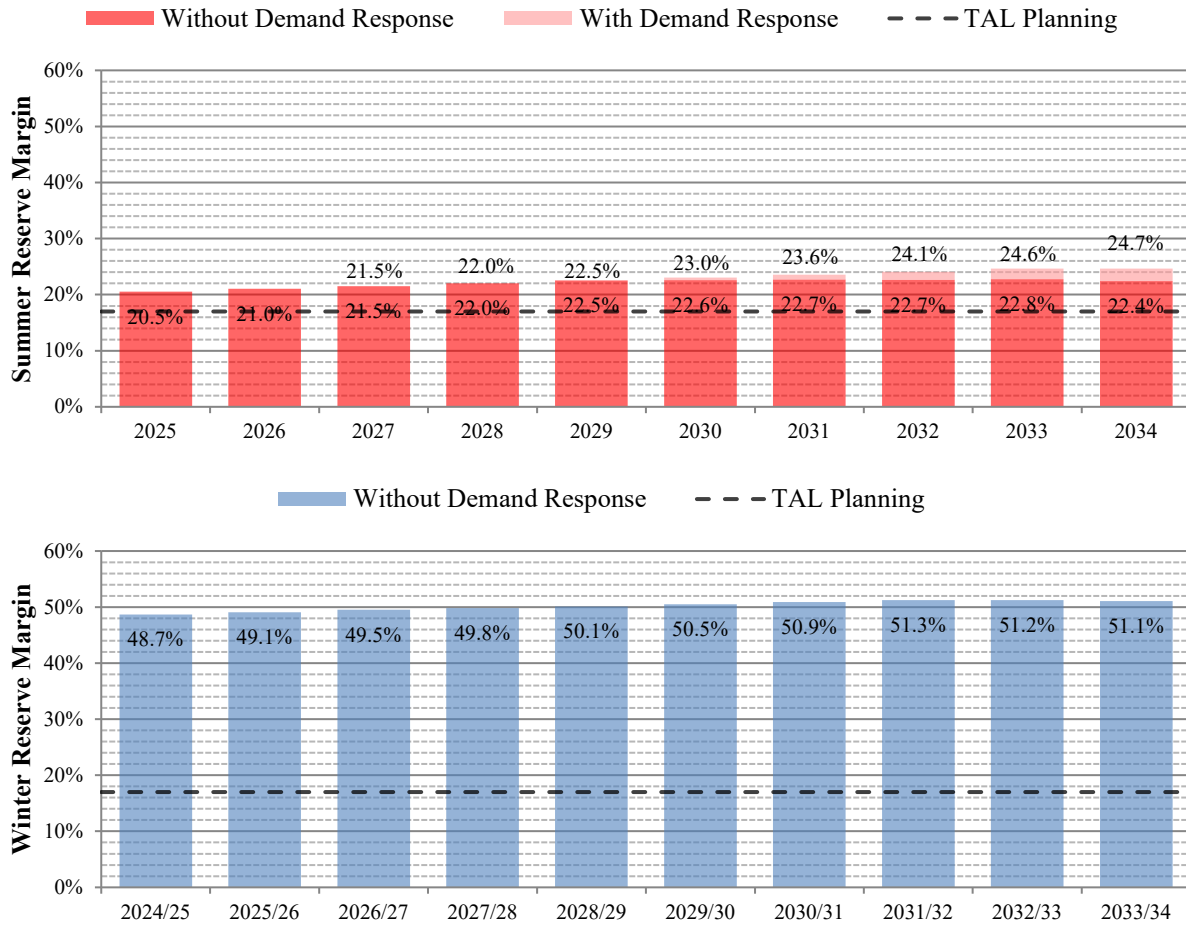
Fuel Type	Net Energy for Load			
	2024		2034	
	GWh	%	GWh	%
Natural Gas	2,985	104.8%	2,846	97.4%
Coal	0	0.0%	0	0.0%
Nuclear	0	0.0%	0	0.0%
Oil	0	0.0%	0	0.0%
Renewable	96	3.4%	111	3.8%
Interchange	0	0.0%	0	0.0%
NUG & Other	(232)	(8.1%)	(35)	(1.2%)
Total	2,849		2,922	

Source: 2025 TYSP and Data Responses

Reliability Requirements

TAL utilizes a 17 percent planning reserve margin criterion for seasonal peak demand. Figure 50 displays the forecast planning reserve margin for TAL through the planning period for both seasons, with and without the use of demand response. As discussed above, TAL only offers demand response programs applicable to the summer peak. As shown in the figure, TAL's generation needs are controlled by its summer peak throughout the planning period.

Figure 50: TAL Reserve Margin Forecast



Source: 2025 TYSP

Generation Resources

TAL plans no unit additions or retirements during the planning period.

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

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

DATE: October 22, 2025

TO: Braulio L. Baez, Executive Director

FROM: Penelope D. Buys, Engineering Specialist IV, Division of Engineering

PB TB
LK MR

RE: Annual Status Report on Storm Protection Plan Activities of Florida Investor-Owned Utilities

CRITICAL INFORMATION: Place on November 4, 2025 Internal Affairs Agenda. Commission approval is sought, due to the Governor and Legislature by December 1, 2025.

Pursuant to Section 366.96(10), F.S., the Commission is required to submit to the Governor, the President of the Senate, and the Speaker of the House of Representatives a status report of the utilities' storm protection activities. The attached draft satisfies the requirement of the Statute and its approval by the Commission is sought. The report is due by December 1, 2025.

Please let me know if you have any questions or need additional information in reference to the attached document.

PB:da

Attachment

cc: Adria Harper, General Counsel
Apryl Lynn, Deputy Executive Director, Administrative
Mark Futrell, Deputy Executive Director, Technical

Draft 10/22/25



Annual Status Report on Storm Protection Plan Activities of Florida Investor-Owned Utilities

As Required by Section 366.96(10), Florida Statutes



NOVEMBER 2025

Draft 10/22/25

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Acronyms

DEF	Duke Energy Florida, LLC
EWL	Extreme Wind Loading
F.A.C.	Florida Administrative Code
FPL	Florida Power & Light Company
FPUC	Florida Public Utilities Company
F.S.	Florida Statutes
GULF	Gulf Power Company
IOU	Investor-Owned Electric Utility
NESC	National Electric Safety Code
OPC	Office of Public Counsel
SPP	Storm Protection Plan
SPPCRC	Storm Protection Plan Cost Recovery Clause
TECO	Tampa Electric Company

Draft 10/22/25

Executive Summary

In 2019, the Florida Legislature passed Senate Bill 796 to enact Section 366.96, Florida Statutes (F.S.), entitled “Storm Protection Plan Cost Recovery.” Section 366.96, F.S., requires each investor-owned electric utility (IOU) to file a transmission and distribution Storm Protection Plan (SPP) that covers the immediate 10-year planning period. The plans are required to be filed with the Florida Public Service Commission (the Commission or FPSC) at least every three years and must explain the systematic approach the utility will follow to achieve the objectives of reducing restoration costs and outage times associated with extreme weather events and enhancing reliability. Pursuant to Section 366.96(7), F.S., the Commission shall conduct an annual proceeding to determine the utility’s prudently incurred SPP costs. In addition, Section 366.96(10), F.S., requires that the Commission submit an annual report to the Governor, President of the Senate, and Speaker of the House of Representatives, on the status of the utility’s storm protection activities and costs, which is the purpose of this report.

This report is a summary of information provided pursuant to Rule 25-6.030(4), Florida Administrative Code (F.A.C.), which includes:

- Planned and completed SPP programs and projects in the previous year.
- Actual costs and rate impacts associated with completed SPP activities compared to the estimated costs and rate impacts for the same activities.
- Estimated costs and rate impacts associated with SPP programs and projects planned for the next year.

Sections 3 through 6 of this report summarize the information required pursuant to Section 366.96(10) F.S., for Duke Energy Florida, LLC (DEF), Florida Power & Light Company (FPL), Florida Public Utilities Company (FPUC), and Tampa Electric Company (TECO). A majority of these SPP programs are a continuation of the utility’s previously approved Storm Hardening Plan¹ and SPP.²

Section 366.96(7), F.S., requires the FPSC to conduct an annual proceeding to determine the utility’s prudently incurred transmission and distribution storm protection plan costs and allow the utility to recover such costs through a charge separate and apart from its base rates, to be referred to as the storm protection plan cost recovery clause (SPPCRC). Prior to enactment of Section 366.96, F.S., costs to strengthen or harden an IOU’s transmission and distribution infrastructure to withstand extreme wind events were recovered through base rates. The FPSC changes base rates infrequently but conducts an evidentiary proceeding or rate case, upon petition by an IOU or if the earnings of the IOU indicate that existing base rates may no longer be fair, just, reasonable, or compensatory. Examples of costs recovered by base rates include new power plants such as solar facilities, modifications to existing power plants, transmission and distribution facilities, and other costs to maintain these facilities and operate the utility.

¹Docket No. 20180144-EI (FPL), Docket No. 2018045-EI (TECO), Docket No. 20180146-EI (DEF), Docket No. 20180147-EI (Gulf) and Docket No. 20180148-EI (FPUC), *In re: Review of 2019-2021 storm hardening plan*.

²Docket No. 20220051-EI (FPL), Docket No. 20250050-EI (DEF), Docket No. 20220048-EI (TECO), and Docket No. 20220049-EI (FPUC), *In re: Review of Storm Protection Plan pursuant to Rule 25-6.030, F.A.C.*

Beginning in 2020, the FPSC holds an annual evidentiary hearing for the SPPCRC that features a review of projected costs and a true-up of actual costs to establish SPPCRC factors or rates charged to customers. This recurring, self-correcting process balances cost over-recoveries and under-recoveries to more closely reflect actual costs in any given period.

Section 366.96(8), F.S., requires that costs recovered through the SPPCRC may not include costs recovered through an IOU's base rates. Throughout 2020 and 2021, the Commission approved various Settlement Agreements and Stipulations that moved existing storm protection costs from base rates to the SPPCRC. Today, more than 95% of the utilities' storm protection costs are being recovered through the SPPCRC. As part of its implementation of the SPPCRC for each IOU, the FPSC ensures that the SPPCRC rates or factors do not include costs recovered through base rates.

Because the majority of storm protection costs have now transitioned to the SPPCRC, this report will deemphasize the base rate component of such costs. Going forward, this will provide a clearer summary of the impacts resulting from the legislative changes. Table A provides a summary of each IOU's reported estimated and actual total storm protection plan expenditures collected through the SPPCRC. Table B is a summary of each utility's reported estimated and actual total bill impacts for a typical residential customer resulting from the approved SPPCRC factor. For reference purposes, only the initial year 2020 contains a base rate component because this was prior to any additional SPP activities or transition of such costs.

Section 7 includes summary tables of the actual SPPCRC costs, and bill impacts for each company since inception of the SPPs.

Table A
Summary of SPPCRC Costs

Utility	2020* Actual (Millions)	2024 Estimated (Millions)	2024 Actual (Millions)	2025 Estimated (Millions)
Duke Energy Florida, LLC	\$239.3	\$771.0	\$698.7	\$850.5
Florida Power & Light/ Gulf Power Company	\$1,037.2 \$36.6	\$1,540.5	\$1,549.0	\$1,571.7
Florida Public Utilities Company**		\$15.8	\$19.2	\$24.3
Tampa Electric Company	\$36.9	\$215.5	\$203.2	\$211.1
Totals	\$1,350.0	\$2,542.7	\$2,470.2	\$2,657.5

*Note: The 2020 Actual amounts are from the Company's 2020 SPP Annual reports.

**Note: The Commission granted a motion to defer FPUC's 2020 SPP filing and refrain from participating in the SPPCRC proceeding due to circumstances affecting the utility as a result of Hurricane Michael in 2020. FPUC's first SPP was approved, with modifications, at the October 4, 2022 Commission Conference.

Table B
Summary of Total Bill Impacts (in dollars)

Utility	2020* Actual Residential Bill Impact (\$/1,000 kWh)	2024 Estimated Residential Bill Impact (\$/1,000 kWh)	2024 Actual Residential Bill Impact (\$/1,000 kWh)	2025 Estimated Residential Bill Impact (\$/1,000 kWh)
Duke Energy Florida, LLC	\$2.05	\$5.10	\$5.10	\$8.01
Florida Power & Light/ Gulf Power Company	\$1.29	\$5.57	\$5.57	\$8.10
	\$0.98			
Florida Public Utilities Company**		\$4.32	\$4.32	\$9.97
Tampa Electric Company	\$1.03	\$6.58	\$6.58	\$8.38

*Note: The 2020 Actual amounts are from the Company's 2020 SPP Annual reports.

**Note: The Commission granted a motion to defer FPUC's 2020 SPP filing and refrain from participating in the SPPCRC proceeding due to circumstances affecting the utility as a result of Hurricane Michael in 2020. FPUC's first SPP was approved, with modifications, at the October 4, 2022 Commission Conference.

***Note: The estimated and actual bill impacts for 2024 are identical because any additional costs incurred during 2024 are reflected in the subsequent year's SPPCRC factor.

Draft 10/22/25

Section 1 – Background

In order to implement the new statute, the Commission staff held two rule development workshops, on June 25, 2019, and August 20, 2019, to obtain stakeholder comments on the draft rules. Representatives from each IOU, Florida Retail Federation, Florida Industrial Power Users Group, and the Office of Public Counsel (OPC) participated at the workshops and submitted post-workshop comments. Additionally, representatives from Florida Electric Cooperatives Association, Inc., and Florida Municipal Electric Association submitted post-workshop comments.

The Commission proposed the adoption of Rules 25-6.030, F.A.C., Storm Protection Plan, and 25-6.031, F.A.C., Storm Protection Plan Cost Recovery Clause, at its October 3, 2019 Commission Conference.³ However, the rules were challenged and an administrative hearing was held on December 20, 2019, at the Department of Administrative Hearings.⁴ The Administrative Law Judge issued a final order on January 21, 2020, deeming the rules as valid and the rules became effective on February 18, 2020.

On January 15, 2025, DEF, FPL, FPUC, and TECO each filed their 2026 - 2035 SPPs.⁵ The Commission approved the SPPs, with modifications, during the technical hearing on May 20, 2025.⁶ However, this report reflects data from the prior SPPs and the most recent annual status report updates as the recently approved SPPs are for the time period 2026-2035.⁷

Pursuant to Section 366.96(8), F.S., and Rule 25-6.031, F.A.C., SPP costs that are being recovered through the SPPCRC cannot be recovered through base rates or any other cost recovery method. SPP costs that are being recovered through the SPPCRC are evaluated by the Commission on an annual basis via the SPPCRC docket. The most recent SPPCRC docket was opened on January 2, 2025, and the Commission approved several stipulations on November 4, 2025, which established SPPCRC factors for 2026.⁸

³Docket No. 20190131-EU, *In re: Proposed adoption of Rule 25-6.030, F.A.C., Storm Protection Plan and Rule 25-6.031, F.A.C., Storm Protection Plan Cost Recovery Clause*.

⁴Case No. 19-006137RP, *In re: Petitioner and Intervenor had standing to challenge the proposed rules, but the evidence showed that the proposed rules are not invalid exercises of delegated legislative authority*.

⁵Docket No. 20250014-EI (FPL), Docket No. 20250015-EI (DEF), Docket No. 20250016-EI (TECO) and Docket No. 20250017-EI (FPUC), *In re: Review of Storm Protection Plan pursuant to Rule 25-6.030, F.A.C.*

⁶Order Nos. PSC-2025-0218-FOF-EI, PSC-2025-0217-FOF-EI, PSC-2025-0219-FOF-EI, and PSC-2025-0216-FOF-EI

⁷Docket No. 20220051-EI (FPL), Docket No. 20220050-EI (DEF), Docket No. 20220048-EI (TECO), and Docket No. 20220049-EI (FPUC), *In re: Review of Storm Protection Plan pursuant to Rule 25-6.030, F.A.C.*

⁸Docket No. 20250010-EI, *In re: Storm Protection Plan Cost Recovery Clause*.

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Section 2 - Summary of Filings

DEF, FPL, FPUC, and TECO timely filed their annual status reports regarding their SPP programs.⁹ As required by Section 366.96(10), F.S., these status reports include:

- A description of all planned and completed SPP programs and projects in 2024.
- Actual costs and rate impacts associated with completed SPP activities compared to the estimated costs and rate impacts for the same activities.
- Estimated costs and rate impacts associated with SPP programs and projects planned for 2025.

Each section below contains a brief description of each utility's SPP programs as of January, 2025. A majority of these programs are a continuation of the utility's SPP previously approved by the Commission. The tables contained within each section summarize the information required pursuant to Section 366.96(10), F.S. Additional details of the programs are also contained in each utility's annual status report and its filings in the annual SPPCRC proceeding.

⁹<https://www.psc.state.fl.us/storm-protection-plans>.

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Section 3 - Duke Energy Florida, LLC Program Descriptions

Below are DEF's current programs as of January 1, 2025. Further details of the programs are in DEF's SPP¹⁰ or its annual SPP report.¹¹

Distribution Self-Optimizing Grid

This program utilizes automated switching which allows most circuits to be restored from alternate sources. The program has connectivity projects that create tie points between circuits and adds segmentation such that the distribution circuits have much smaller line segments, thus reducing the number of customers that are affected by outages.

Distribution Pole Replacements and Inspections

DEF inspects wood distribution poles on an average eight-year cycle to determine the extent of pole decay and any associated loss of strength. The information gathered from the inspections is used to determine if the pole needs to be replaced or if treatment and reinforcement will extend the life of the pole. DEF completes a loading analysis on poles with joint-use attachments on its system on an average eight-year cycle.

Distribution Feeder Hardening

This program will enable the feeder backbone to better withstand extreme weather events. This includes strengthening or replacing structures, updating basic insulation levels and conductors to current standards, relocating difficult to access facilities, and incorporates the Company's pole inspection and replacement activities. All new structures will meet the National Electric Safety Code (NESC) 250C extreme wind load (EWL) standard.

Distribution Lateral Hardening (Overhead and Underground)

This program will enable branch lines to better withstand extreme weather events. The Lateral Hardening Program includes undergrounding of the laterals that are most prone to damage during extreme weather events and are in inaccessible locations, and overhead hardening of those laterals less prone to damage. Laterals will also be relocated to accessible locations, where practical.

Distribution Underground Flood Mitigation

This program will harden existing underground facilities in locations that are prone to storm surge during extreme weather events. This involves the installation of specialized stainless-steel equipment, submersible connections, and concrete pads with increased mass.

Distribution Vegetation Management

The program consists of routine maintenance trimming, hazard tree removal, herbicide applications, vine removal, customer requested work, and right-of-way brush mowing where applicable. DEF trims its feeders on an average three-year cycle and trims its laterals on an average five-year cycle.

¹⁰Docket No. 20220050-EI, *In re: Review of Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC*.

¹¹<https://www.floridapsc.com/pscfiles/website-files/PDF/Utilities/Electricgas/StormProtectionPlans/2023/2023%20Duke%20Energy%20Florida,%20Inc.%20SPP%20Annual%20Status%20Report.pdf>.

Transmission Structure and Drone Inspections

The transmission system's inspection activities include all types of structures, line hardware, guying, and anchoring systems. Ground-line inspections determine the extent of pole decay and any associated loss of strength. The wood transmission poles are inspected on a four-year cycle and the transmission non-wooden poles and towers are inspected on a six-year cycle. Drone inspections provide high-resolution imagery for structure, hardware and insulation vulnerabilities that otherwise would be difficult to see.

Transmission Pole Replacements

This program's activities are based on the results of the inspections of wood transmission poles. This activity upgrades wood poles to non-wood material such as steel or concrete. Other related hardware upgrades will occur simultaneously, such as insulators, crossarms, switches, and guys.

Transmission Tower Upgrades

This program focuses on the replacement of tower types that failed during extreme weather events as well as lattice towers identified during inspection results and cathodic protection data. It will prioritize towers based on inspection data and enhanced weather modeling.

Transmission Overhead Ground Wire

This program targets lines to improve lightning protection. The program prioritizes the replacement of deteriorated overhead ground wires by targeting lines with frequent lightning events, outage histories, structure design types, overhead ground wire materials, and inspection results.

Transmission GOAB Automation

The Gang Operated Air Break (GOAB) line switch automation project is an initiative that will upgrade switch locations with modern switches enabled with remote-control capabilities. The GOAB upgrades increase the number of remote-control switches to support faster isolation of trouble spots on the transmission system and more rapid restoration following line faults.

Transmission Cathodic Protection

This program mitigates active ground level corrosion on the steel lattice tower system. The Cathodic Protection program includes the installation of passive cathodic protection systems, comprised of anodes on each leg of the lattice towers. The anodes serve as sacrificial assets that corrode in place of the structural steel, preventing loss of structure strength due to corrosion.

Transmission Substation Flood Mitigation

The Substation Flood Mitigation program, using flood plain and storm surge data, includes a systematic review and prioritization of substations at risk of flooding to determine the proper mitigation solution. The mitigation solutions may include elevating or modifying equipment or relocating substations altogether. As shown in Table 3-1, there has been no spending regarding this program in 2023 or 2024.

Transmission Substation Hardening

The replacement of oil circuit breakers with state-of-the-art breakers will result in the transmission system being able to more effectively and consistently isolate faults, reclose after momentary interruptions, and improve the customer experience through fewer interruptions. The replacement of electro-mechanical relays with electronic relays is designed to provide rapid communication capabilities and microprocessor technology, which enables a quicker recovery from events. Relay upgrades will be matched with breaker replacements.

Transmission Vegetation Management

DEF's Transmission vegetation management program focuses on ensuring the safe and reliable operation of the transmission system by minimizing vegetation-related interruptions and adequate conductor-to-vegetation clearances. The program consists of planned threat and condition-based work, hazard tree mitigation, and floor management (herbicide, mowing, and hand cutting).

Table 3-1 provides a list of the projects and activities planned and completed for 2024 and the projects and activities planned for 2025. In addition, the table includes a comparison of the estimated and actual costs of the projects and activities for 2024 and the estimated costs for 2025.

**Table 3-1
DEF's SPP Projects Planned & Completed for 2024–2025
(SPPCRC Only)**

Program name	Projects/ Activities Planned for 2024	Estimated Cost for 2024 (Millions)	Projects/ Activities Completed in 2024	Actual Cost for 2024 (Millions)	Projects/ Activities Planned for 2025	Estimated Cost for 2025 (Millions)
Dist. Self-Optimizing Grid	944	\$ 79.5	739	\$104.6	911	\$107.2
Dist. Feeder Hardening	117	\$157.6	174	\$219.3	124	\$159.6
Dist. Feeder Hardening Pole Replacements (poles)	1,955	\$ 20.7	855	\$ 7.9	3,319	\$ 36.2
Dist. Feeder Hardening Pole Inspections (poles)	28,221	\$ 1.1	21,366	\$ 0.8	31,264	\$ 1.0
Dist. Lateral Hardening-Overhead	113	\$ 87.5	168	\$ 72.4	111	\$112.5
Dist. Lateral Hardening Pole Replacements (poles)	6,545	\$ 69.3	5,639	\$ 41.6	5,802	\$ 47.6
Dist. Lateral Hardening Pole Inspections (poles)	72,569	\$ 2.9	69,667	\$ 2.8	99,260	\$ 3.1
Dist. Lateral Hardening-Underground (circuits)	24	\$112.4	90	\$ 13.3	66	\$116.4
Dist. Underground Flood Mitigation	7	\$ 0.3	4	(\$ 0.3)	4	\$ 2.8
Dist. Vegetation Management (miles)	4,179	\$ 49.0	4,006	\$ 47.7	4,599	\$ 51.3
Trans. Pole/Tower Inspections/Drone Inspections	12,820	\$ 0.6	12,647	\$ 0.4	12,971	\$ 0.6
Trans. Pole Replacements (poles)	1,853	\$121.7	1,961	\$123.8	1,853	\$121.7
Trans. Tower Upgrades (# of locations)	2	\$ 11.9	6	\$ 12.8	2	\$ 20.2
Trans. Overhead Ground Wire (# of locations)	7	\$ 11.0	38	\$ 8.7	13	\$ 20.3
Trans. GOAB Automation (# of locations)	7	\$ 8.3	26	\$ 5.4	6	\$ 6.6
Trans. Cathodic Protection (# of locations)	3	\$ 2.5	10	\$ 2.6	8	\$ 2.5
Trans. Substation Hardening	22	\$ 11.7	22	\$ 11.2	33	\$ 17.2
Trans. Substation Flood Mitigation	0	\$ 0.0	0	\$ 0.0	1	\$ 0.5
Trans. Vegetation Management (miles)	755	\$ 22.9	756	\$ 23.7	648	\$ 22.9
Totals		\$771.0		\$698.7		\$850.5

Source: DEF's 2024 SPP Annual Report and responses to staff's data requests.

Note: Trans. = Transmission; Dist. = Distribution.

Table 3-2 provides the typical residential customer's bill impact for the implementation of DEF's SPP programs. These values represent the total costs of DEF's SPP activities recovered through the SPPCRC. For reference purposes, only the initial year 2020 contains a base rate component because this was prior to any additional SPP activities or transition of such costs.

Table 3-2
DEF's Actual and Projected Bill Impacts (in dollars)

2020* Actual		2024 Estimated**		2024 Actual**		2025 Estimated	
Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)
\$239.3	\$2.05	\$771.0	\$5.10	\$698.7	\$5.10	\$850.5	\$8.01

Source: DEF's 2024 SPP Annual Report, responses to staff's data requests and Docket No. 20230010-EI and 20240010-EI.

*Note: The 2020 Actual amounts are from the Company's 2020 SPP Annual Report.

** Note: The estimated and actual bill impacts for 2024 are identical because any additional costs incurred during 2024 are reflected in the subsequent year's SPPCRC factor.

Draft 10/22/25

Section 4 - Florida Power & Light Program Descriptions

Gulf Power Company (Gulf) was merged with FPL in 2021 and 2022; the utilities were consolidated for ratemaking purposes as FPL. Below are FPL's current programs as of January 1, 2025. Further details of the programs are in FPL's SPP¹² or in its annual SPP report.¹³

Distribution Inspection

This program includes an eight-year pole inspection cycle for all distribution poles throughout its service area. In addition, joint use poles are inspected as part of the Distribution Inspection Program.

Transmission Inspection

This program ensures that wood, steel, and concrete transmission structures are visually inspected on an annual basis. Transmission circuits and substations will be inspected on a six-year cycle. Climbing or bucket truck inspections on wood structures will be on a six-year cycle and climbing or bucket truck inspections on steel and concrete structures will be on a ten-year cycle.

Distribution Feeder Hardening

FPL hardens feeders throughout its service area, considering historical reliability performance, restoration difficulties, ongoing/upcoming projects, and geographic locations. This includes FPL's initiative of design and construction practices to meet the NESC EWL criteria.

Distribution Lateral Hardening

FPL originally started this program as a pilot program in 2018 and has continued the program as part of its SPP. This program targets certain overhead laterals, which were impacted by recent storms and have a history of vegetation-related outages and other reliability issues, for conversion from overhead to underground.

Transmission Hardening

This program replaces all wood transmission structures with steel or concrete structures. As of year-end 2024, 96 percent of FPL's transmission structures are steel or concrete with approximately 3,200 wood transmission structures remaining in the Northwest Florida service area.

Distribution Vegetation Management

To maintain current cycles, FPL plans to inspect and maintain, on average, approximately 17,500 miles of feeders and laterals, which is consistent with historically recorded miles. This program includes a three-year average vegetation maintenance cycle for feeders, mid-cycle targeted

¹² Docket No. 20220051-EI, *In re: Review of Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company*.

¹³ <https://www.floridapsc.com/pscfiles/website-files/PDF/Utilities/Electricgas/StormProtectionPlans/2023/2023%20Florida%20Power%20&%20Light%20Company%20SPP%20Annual%20Status%20Report.pdf>.

vegetation maintenance cycle for certain feeders, six-year average vegetation maintenance cycle for laterals, and continued customer education through FPL's "Right Tree, Right Place" initiative.

Transmission Vegetation Management

FPL plans to inspect and maintain, on average, approximately 9,500 miles of its transmission lines annually, which is comparable to the historically maintained miles. This program includes inspecting the rights-of-way of transmission infrastructure, documenting vegetation inspection results and findings, and prescribing and executing a work plan.

Substation Storm Surge/Flood Mitigation

The Substation Storm Surge/Flood Mitigation program is a continuing program, first established in FPL's 2020 SPP. Damage to substations that are susceptible to storm surge and flooding during extreme weather events can be prevented and/or mitigated by raising the equipment at certain substations above flood level and constructing flood protection walls around other substations.

Table 4-1 provides a list of the projects and activities planned and completed by FPL for 2024 and the projects and activities planned for 2025. In addition, the table includes a comparison of the estimated and actual costs of the projects and activities for 2024 and the estimated costs for 2025.

Table 4-1
FPL's SPP Projects Planned & Completed for 2024–2025
(SPPCRC Only)

Program Name	Projects/ Activities Planned for 2024	Estimated Cost for 2024 (Millions)	Projects/ Activities Completed in 2024	Actual Cost for 2024 (Millions)	Projects/ Activities Planned for 2025	Estimated Cost for 2025 (Millions)
Dist. Inspection (poles)	180,000	\$ 41.5	183,179	\$ 37.2	180,000	\$ 42.5
Trans. Inspections	84,000	\$ 52.0	83,573	\$ 71.1	84,000	\$ 49.8
Dist. Feeder Hardening	385	\$ 680.6	312	\$ 742.0	194	\$ 623.7
Dist. Lateral Hardening	1,092	\$ 602.6	1,144	\$ 554.5	1,298	\$ 687.1
Trans. Hardening	463	\$ 25.5	275	\$ 7.9	347	\$ 24.2
Dist. Vegetation Management (miles)	18,268	\$ 117.8	18,348	\$ 113.1	18,041	\$ 120.4
Trans. Vegetation Management (miles)	9,410	\$ 12.5	9,416	\$ 15.7	9,410	\$ 15.4
Substation Storm Surge/Flood Mitigation	1	\$ 8.0	1	\$ 7.6	2	\$ 8.5
Totals	N/A	\$1,540.5	N/A	\$1,549.0		\$1,571.7

Source: FPL's 2024 SPP Annual Report and responses to staff's data requests.

Note: Trans. = Transmission; Dist. = Distribution.

Table 4-2 provides the typical residential customer's bill impact for the implementation of FPL's SPP programs. These values represent the total costs of FPL's SPP activities which are recovered through the SPPCRC. For reference purposes, only the initial year 2020 contains a base rate component because this was prior to any additional SPP activities or transition of such costs.

Table 4-2
FPL's Actual and Projected Bill Impacts (in dollars)

	2020* Actual		2024 Estimated**		2024 Actual**		2025 Estimated	
	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)
FPL	\$1,037.2	\$1.29	\$1,540.5	\$5.57	\$1,549.0	\$5.57	\$1,571.7	\$8.10
Gulf	\$36.6	\$0.98						

Source: FPL's 2024 SPP Annual Report, responses to staff's data requests, and Docket Nos. 20230010-EI and 20240010-EI.

*Note: The 2020 Actual amounts are from the Company's 2020 SPP Annual Reports.

** Note: The estimated and actual bill impacts for 2024 are identical because any additional costs incurred during 2024 are reflected in the subsequent year's SPPCRC factor.

Section 5 - Florida Public Utilities Company Program Descriptions

Below are FPUC's current programs as of January 1, 2025. Further details of the programs are in FPUC's SPP¹⁴ or its annual SPP report.¹⁵

Distribution Overhead Feeder Hardening

FPUC will analyze its feeders, leveraging specialized software, to ensure the feeder is adhering to NESC 250C EWL standards. If applicable, upgrades could include upgrading the class of the pole or adding intermediate poles.

Distribution Overhead Lateral Hardening

FPUC will analyze its overhead laterals, leveraging specialized software, to ensure the feeder is adhering to NESC 250C EWL standards. If applicable, upgrades could include upgrading the class of the pole or adding intermediate poles.

Distribution Overhead Lateral Undergrounding

This program addresses the systematic undergrounding or relocation and undergrounding of the single-phase overhead laterals. Many of these laterals are located in heavily vegetated areas, environmentally sensitive areas, or in areas where upgrading the overhead laterals to NESC EWL standards is not practical or consistent with industry design standards.

Distribution Pole Inspections and Replacement

All of FPUC's distribution poles are on an eight-year inspection cycle. Distribution poles are inspected by visual inspection techniques, sound and bores, and excavations with treatments. The poles are replaced using the NESC EWL standards.

Transmission and Distribution Vegetation Management

This program includes a new four-year cycle on the feeders and laterals, increased participation with local governments to address overall reliability due to tree related outages, and information made available to customers regarding the maintenance and placement of trees. The transmission lines are also on a four-year cycle, as parts of the transmission system run along the same rights-of-way as the distribution system. The transmission system is monitored on an annual basis in order to address any conditions that may impact the reliability of the system.

Transmission Inspection and Hardening

FPUC's transmission structures are on a six-year detailed inspection cycle. The most recent inspection was conducted in 2024. FPUC's substation equipment is inspected annually. FPUC's 138kV transmission system includes concrete poles, steel poles, and steel towers. Its 69kV

¹⁴Docket No. 20220049-EI, *In re: Review of Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities Company*.

¹⁵<https://www.floridapsc.com/pscfiles/website-files/PDF/Utilities/Electricgas/StormProtectionPlans/2023/2023%20Florida%20Public%20Utilities%20Company%20SPP%20Annual%20Status%20Report.pdf>.

transmission system consists of 134 concrete poles and 83 wood poles. As necessary, wood poles will be replaced with concrete poles that meet NESC standards.

Table 5-1 provides a list of the projects and activities planned and completed by FPUC for 2024 and the projects and activities planned for 2025. In addition, the table includes a comparison of the estimated and actual costs of the projects and activities for 2024 and the estimated costs for 2025.

Table 5-1
FPUC's SPP Projects Planned & Completed for 2024–2025
(SPPCRC Only)

Program Name	Projects/ Activities Planned for 2024	Estimated Cost for 2024 (Millions)	Projects/ Activities Completed in 2024	Actual Cost for 2024 (Millions)	Projects/ Activities Planned for 2025	Estimated Cost for 2025 (Millions)
Dist. OH Feeder Hardening	12	\$5.4	18	\$7.32	14	\$7.35
Dist. OH Lateral Hardening	45	\$2.3	77	\$3.25	68	\$5.94
Dist. OH Lateral Hardening UG	27	\$4.5	42	\$4.3	27	\$6.23
Dist. Pole Inspection & Replacement (poles)	3,170	\$0.8	3,212	\$1.01	3,136	\$0.72
Trans & Dist. Vegetation Management (miles)	178.3	\$1.7	153.32	\$1.65	209.8	\$2.44
Trans. Inspection & Hardening	11	\$1.1	12	\$1.62	12	\$1.59
SPP Program Management	N/A	\$0.00	N/A	\$0.00	N/A	\$0.00
Totals		\$ 15.8		\$ 19.2		\$ 24.3

Source: FPUC's 2024 SPP Annual Report and responses to staff's data requests.

Note: Trans. = Transmission; Dist. = Distribution; OH = Overhead; UG = Undergrounding.

Table 5-2 provides the typical residential customer's bill impact for the implementation of FPUC's SPP programs. These values represent the total costs of FPUC's SPP activities recovered through the SPPCRC. For reference purposes, only the initial year 2022 contains a base rate component because this was prior to any additional SPP activities or transition of such costs.

Table 5-2
FPUC's Actual and Projected Bill Impacts (in dollars)

	2023* Actual		2024 Estimated**		2024 Actual**		2025 Estimated	
	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)
FPUC	\$8.81	\$2.20	\$15.82	\$4.32	\$19.14	\$4.32	\$24.27	\$9.97

Source: FPUC's 2024 SPP Annual Report, responses to staff's data requests, and Docket Nos. 20230010-EI and 20240010-EI.

*Note: The Commission granted a motion to defer FPUC's 2020 SPP filing and refrain from participating in the SPPCRC proceeding due to circumstances affecting the utility as a result of Hurricane Michael in 2020. FPUC's first SPP was approved, with modifications, at the October 4, 2022 Commission Conference.

** Note: The estimated and actual bill impacts for 2024 are identical because any additional costs incurred during 2024 are reflected in the subsequent year's SPPCRC factor.

Draft 10/22/25

Section 6 - Tampa Electric Company Program Descriptions

Below are TECO's current programs as of January 1, 2025. Further details of the programs are in TECO's SPP¹⁶ or in its annual SPP report.¹⁷

Distribution Lateral Undergrounding

TECO's Distribution Lateral Undergrounding program is a program that strategically undergrounds existing overhead laterals. The primary factor in prioritizing laterals to be underground is based on reliability performance during extreme weather events.

Distribution and Transmission Vegetation Management

TECO's distribution and transmission vegetation management activities are both addressed in this program. TECO's distribution tree trimming program includes circuit tree trimming activities, mid-cycle trimming activities, customer requested work, and work orders associated with circuit improvement processes. TECO's distribution system is on a four-year cycle and the transmission system is on a two- or three-year cycle depending on voltage level.

Transmission Asset Upgrades

TECO plans to replace its remaining wood transmission poles with non-wood material by the end of its initial 2020-2029 SPP. This is a continuation of TECO's existing storm hardening pole replacement program, which includes replacing poles based on preventative, corrective or project-driven assessments.

Substation Extreme Weather Hardening

Hardening existing substations to minimize outages, reduce restoration times and enhance emergency response during extreme weather events is a program included in TECO's SPP. TECO identified nine substations to be hardened. Two projects were planned for 2024. One project was completed in 2024 and one will be completed in 2025.

Distribution Overhead Feeder Hardening

TECO's distribution system will be hardened to withstand increased wind-loading and harsh environmental conditions associated with extreme weather events by increasing the resiliency and sectionalizing capabilities of the system.

Distribution and Transmission Infrastructure Inspections

TECO's distribution wood pole inspections and transmission structure inspections, and the joint use pole attachment audit are combined into one program. The wood distribution pole inspections are on an eight-year cycle program consisting of visual inspections, sound and bore inspections, and excavations at least 18 inches below ground line. The transmission structure inspections

¹⁶Docket No. 20220048-EI, *In re: Review of Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company*.

¹⁷<https://www.floridapsc.com/pscfiles/website-files/PDF/Utilities/Electricgas/StormProtectionPlans/2023/2023%20Tampa%20Electric%20Company%20SPP%20Annual%20Status%20Report.pdf>.

include a range of inspections from ground to aerial infrared patrols with a range of cycles from annual to eight years. The joint use pole attachment audit is a comprehensive loading analysis to ensure TECO's poles with joint use attachments are not overloaded and meet the NESC standards. This audit will be performed every four to five years.

Table 6-1 provides a list of the projects and activities planned and completed for 2024 and the projects and activities planned for 2025. In addition, the table includes a comparison of the estimated and actual costs of the projects and activities for 2024 and the estimated costs for 2025. The table identifies the costs recovered through the SPPCRC.

**Table 6-1
TECO's SPP Projects Planned & Completed for 2024–2025
(SPPCRC Only)**

Program Name	Projects/ Activities Planned for 2024	Estimated Cost for 2024 (Millions)	Projects/ Activities Completed in 2024	Actual Cost for 2024 (Millions)	Projects/ Activities Planned for 2025	Estimated Cost for 2025 (Millions)
Dist. Lateral Undergrounding	305	\$134.4	89	\$130.5	202	\$134.9
Dist. Vegetation Management (miles)	3,250	\$ 24.2	2,841	\$ 21.1	3,224	\$ 29.2
Trans. Vegetation Management (miles)	540	\$ 3.0	525	\$ 3.5	530	\$ 4.1
Trans. Asset Upgrades (poles)	472	\$ 17.9	428	\$ 16.8	471	\$ 15.7
Substation Extreme Weather Hardening	1	\$ 4.5	1	\$ 2.6	2	\$ 3.0
Dist. Overhead Feeder Hardening	37	\$ 25.4	9	\$ 25.4	31	\$ 20.9
Dist. Infrastructure Inspections (pole and structures)	35,625	\$ 1.4	36,789	\$ 1.1	35,625	\$ 1.4
Trans. Infrastructure Inspections (poles and structures)	3,052	\$ 0.6	125	\$ 0.6	161	\$ 0.6
SPP Planning & Common	N/A	\$ 1.1	N/A	\$ 1.6	N/A	\$ 1.3
Totals		\$ 212.5		\$ 203.2		\$ 211.1

Source: TECO's 2024 SPP Annual Report and responses to staff's data requests.

Note: Trans. = Transmission; Dist. = Distribution.

Table 6-2 provides the typical residential customer’s bill impact for the implementation of TECO’s SPP programs. These values represent the total costs of TECO’s SPP activities recovered through the SPPCRC. For reference purposes, only the initial year 2020 contains a base rate component because this was prior to any additional SPP activities or transition of such costs.

Table 6-2
TECO’s Actual and Projected Bill Impacts (in dollars)

2020* Actual		2024 Estimated**		2024 Actual**		2025 Estimated	
Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)	Total Costs (Millions)	Residential Bill Impact (\$/1,000 kWh)
\$36.9	\$1.03	\$212.5	\$6.58	\$203.2	\$6.58	\$211.1	\$8.38

Source: TECO’s 2024 SPP Annual Report, responses to staff’s data requests, and Docket Nos. 20230010-EI and 20240010-EI.

*Note: The 2020 Actual amounts are from the Company’s 2020 SPP Annual Reports.

** Note: The estimated and actual bill impacts for 2024 are identical because any additional costs incurred during 2024 are reflected in the subsequent year’s SPPCRC factor.

Section 7 - Appendix

Table 7-1 provides the actual costs for each company's SPP for 2020-2024. Table 7-2 provides the typical residential customer's bill impact for the implementation of each company's SPP programs for 2020-2024. For Table 7-2, only the initial year 2020 contains a base rate component because this was prior to any additional SPP activities or transition of such costs.

Table 7-1
Actual Total SPPCRC Costs (Millions)

	DEF	FPL	FPUC*	Gulf**	TECO	Total
2020	\$239.3	\$1,037.2		\$36.6	\$36.9	\$1,350.0
2021	\$343.5	\$1,149.5	\$0.0	\$96.3	\$115.1	\$1,704.4
2022	\$416.5	\$1,292.4	\$1.7		\$202.4	\$1,912.3
2023	\$684.2	\$1,374.6	\$8.8		\$208.9	\$2,280.9
2024	\$698.7	\$1,549.0	\$19.2		\$203.2	\$2,470.2

Source: The Company's 2020-2024 SPP Annual Reports.

*Note: The Commission granted a motion to defer FPUC's 2020 SPP filing and refrain from participating in the SPPCRC proceeding due to circumstances affecting the utility as a result of Hurricane Michael in 2020. FPUC's first SPP was approved, with modifications, at the October 4, 2022 Commission Conference.

**Note: Gulf was merged with FPL in 2021 and in 2022, the utilities were consolidated for ratemaking purposes into FPL.

Table 7-2
Actual SPP Bill Impacts (Residential \$/1,000 kWh)

	DEF	FPL	FPUC*	Gulf**	TECO
2020	\$2.05	\$1.29		\$0.98	\$1.03
2021	\$0.31	\$0.42		\$0.37	\$2.39
2022	\$3.00	\$2.14	\$0.84		\$3.29
2023	\$4.14	\$3.82	\$2.50		\$3.73
2024	\$5.10	\$5.57	\$4.32		\$6.58

Source: The Company's 2020-2024 SPP Annual Reports, SPPCRC Dockets, and responses to staff's data request.

*Note: The Commission granted a motion to defer FPUC's 2020 SPP filing and refrain from participating in the SPPCRC proceeding due to circumstances affecting the utility as a result of Hurricane Michael in 2020. FPUC's first SPP was approved, with modifications, at the October 4, 2022 Commission Conference.

**Note: Gulf was merged with FPL in 2021 and 2022, the utilities were consolidated for ratemaking purposes into FPL.

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

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

DATE: November 22, 2025

TO: Braulio Baez, Executive Director

FROM: Division of Economics (Barrett) *MCB*

EJD

RE: Draft Report on Activities Pursuant to the Florida Energy Efficiency and Conservation Act (FEECA). Due March 1, 2026 to the Governor and Legislature.

Critical Information: Please place on the November 4, 2025 Internal Affairs agenda. Commission approval is sought.

Section 366.82(10), Florida Statutes (F.S.), requires the Florida Public Service Commission (Commission) to submit an annual report to the Governor and Legislature on the utilities' progress towards meeting goals established by the Commission pursuant to the Florida Energy Efficiency and Conservation Act. The report is due March 1, 2026.

Furthermore, Section 377.703(2)(f), F.S., requires the Commission to file information on electricity and natural gas energy conservation programs with the Department of Agriculture and Consumer Services.

Staff is seeking Commission approval of the attached draft report. Upon approval, the report will be submitted to the Governor, President of the Senate, Speaker of the House, the Commissioner of Agriculture and Consumer Services, and to the Florida Documents Librarian.

cc: Adria E. Harper, General Counsel
Mark Futrell, Deputy Executive Director, Technical
Apryl Lynn, Deputy Executive Director, Administrative



ANNUAL REPORT ON
**Activities Pursuant TO THE
Florida Energy AND Efficiency
Conservation Act**

As required by Sections 366.82(10), and 377.703(2)(f), and 553.975, Florida Statutes

DECEMBER 2025

Florida Public Service Commission

Annual Report on Activities Pursuant to

The Florida Energy Efficiency and Conservation Act

As Required by Sections 366.82(10), 377.703(2)(f), and 553.975, Florida Statutes

December 2025

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List of Acronyms

C/I	Commercial and Industrial (Customers)
Commission or FPSC	Florida Public Service Commission
COVID-19	Coronavirus Disease of 2019
CUC	Chesapeake Utilities Corporation
DEF	Duke Energy Florida, LLC
DOE	U.S. Department of Energy
DSM	Demand-Side Management
ECCR	Energy Conservation Cost Recovery
EV	Electric Vehicle
F.A.C.	Florida Administrative Code
FCG	Florida City Gas
FEECA	Florida Energy Efficiency and Conservation Act
FLBC	Florida Building Code
FPL	Florida Power & Light Company
FPUC	Florida Public Utilities Company
FRCC	Florida Reliability Coordinating Council
F.S.	Florida Statutes
GPR	Gross Power Rating
GRIM	Gas Rate Impact Measure Test
Gulf	Gulf Power Company
GWh	Gigawatt-Hour
HVAC	Heating, Ventilation, and Air Conditioning
IGC	Indiantown Gas Company
IOU	Investor-Owned Utility
JEA	Formerly known as Jacksonville Electric Authority
kWh	Kilowatt-Hour
LDC	Natural Gas Local Distribution Company
MMBtu	One Million British Thermal Units
MW	Megawatt
MWh	Megawatt-Hour
NGCCR	Natural Gas Conservation Cost Recovery
OUC	Orlando Utilities Commission
O&M	Operations and Maintenance
PV	Photovoltaic
PGS	Peoples Gas System
RIM	Rate Impact Measure Test
SGS	Sebring Gas System
SJNG	St. Joe Natural Gas
TECO	Tampa Electric Company
TRC	Total Resource Cost Test

Executive Summary

Purpose

Reducing the growth of Florida’s peak electric demand and energy consumption became a statutory objective in 1980, with the enactment of Sections 366.80 through 366.83, and Section 403.519, Florida Statutes (F.S.), collectively known and cited as the Florida Energy Efficiency and Conservation Act (FEECA).¹ FEECA emphasizes four key areas: reducing the growth rates of weather-sensitive peak demand and electricity usage, increasing the efficiency of the production and use of electricity and natural gas, encouraging demand-side renewable energy systems, and conserving expensive resources, particularly petroleum fuels. Sections 366.82(2) and 366.82(6), F.S., require the Florida Public Service Commission (FPSC or Commission) to establish goals for the FEECA utilities and review the goals every five years, at minimum. The utilities are required to develop cost-effective demand-side management (DSM) plans that meet those goals and submit them to the Commission for approval.

Energy conservation and DSM in Florida are accomplished through a multi-pronged approach that includes energy efficiency requirements in building codes for new construction, federal appliance efficiency standards, utility programs, and energy education efforts. Utility programs, which are paid for by all customers, are aimed at increasing efficiency levels above building codes and appliance efficiency standards.

The Commission is required by Section 366.82(10), F.S., to provide an annual report to the Florida Legislature and the Governor by March 1 summarizing the adopted goals and the progress made toward achieving those goals. Similarly, Section 377.703(2)(f), F.S., requires the Commission to file information on electricity and natural gas energy conservation programs with the Department of Agriculture and Consumer Services. This report reviews the 2024 annual goal results for each of the FEECA utilities and fulfills these statutory obligations.

The six electric utilities and single natural gas utility subject to FEECA in 2024 are listed below in order of sales:

Electric Investor-Owned Utilities	Municipal Electric Utilities
- Florida Power & Light Company (FPL) - Duke Energy Florida, LLC (DEF) - Tampa Electric Company (TECO) - Florida Public Utilities Company (FPUC)	- JEA - Orlando Utilities Commission (OUC)
	Investor-Owned Natural Gas Local Distribution Company (LDC)
	Peoples Gas System (PGS)

¹For purposes of this report, “FEECA utilities” refers to those utilities subject to a subset of the FEECA statutes, specifically, Section 366.80 through 366.83, F.S., meeting the thresholds set forth on Section 366.82(1)(a), F.S.

The Commission regulates the rates and conservation cost recovery of the four electric IOUs and the single FEECA natural gas LDC. The Commission does not regulate the rates or conservation program costs of the two municipal electric utilities for which it sets DSM goals.

Report Layout

This report presents the FEECA utilities' progress towards achieving the Commission-established goals and the Commission's efforts in overseeing these conservation initiatives. This report details these efforts through the following five sections and appendices:

- Section 1 provides a brief history of FEECA and a description of existing tools for increasing conservation throughout the State of Florida.
- Section 2 discusses the DSM goalsetting process and the most recent Commission-established goals set for the FEECA utilities.
- Section 3 reviews the utilities' goal achievements, and information on audit, low-income, and research and development programs.
- Section 4 provides an overview of the associated 2024 DSM program costs recovered through the Energy Conservation Cost Recovery (ECCR) Clause (as applies to electric IOUs) and Natural Gas Conservation Cost Recovery (NGCCR) Clause (as applies to LDCs).
- Section 5 discusses methods the Commission has used to educate consumers about conservation during the prior period, including a list of related websites.
- Appendices A and B provide a list of the 2024 conservation programs offered by FEECA Utilities and a description of each program's purpose.

2019 Goalsetting Proceeding

In November 2019, the Commission chose to continue with the goals that were established in the 2014 goalsetting proceeding for the period 2020-2024 and directed its staff to review the FEECA process for potential updates and revisions as may be appropriate.² In May 2023, Rule 25-17.0021, F.A.C. was amended in order to streamline information submitted by the utilities to the Commission.³ In 2020, the Commission approved the DSM plans proposed by the investor-owned electric utilities and the municipal electric utilities.⁴

²Order No. PSC-2019-0509-FOF-EG, issued November 26, 2019, in Docket Nos. 20190015-EG through 20190021-EG, *In re: Commission review of numeric conservation goals*.

³See Docket No. 20200181-EU, Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities. Rule development workshops for this docket were conducted in January 2021, May 2021, and November 2022. The amendments to Rule 25-17.0021, F.A.C. that were adopted in May 2023 were used in the 2024 DSM goalsetting proceeding.

⁴Order No. PSC-2020-0140-PAA-EG, issued May 12, 2020, in Docket No. 20200058-EG, *In re: Petition for approval of 2020 demand-side management plan, by Orlando Utilities Commission*; Order No. PSC-2020-0200-PAA-EG, issued June 24, 2020, in Docket No. 20200057-EG, *In re: Petition for approval of 2020 demand-side management plan, by JEA*; Order No. PSC-2020-0274-PAA-EG, issued August 3, 2020, in Docket Nos. 20200053-EG (TECO), 20200054-EG (DEF), 20200055-EG (FPL), 20200056-EG (Gulf), and 20200060-EG (FPUC), *In re: Petition for approval of 2020 demand-side management plans*.

The numeric goals are based on estimated energy and demand savings from individual DSM measures that passed the Rate Impact Measure (RIM) and Participants cost-effectiveness tests.⁵ These tests are used to ensure that all ratepayers benefit from energy efficiency programs due to downward pressure on electric rates.

Section 366.82(2), F.S., also requires that the Commission adopt goals for increasing the development of demand-side renewable energy systems. The Commission recognized in its 2019 review, that Rule 25-6.065, F.A.C., Interconnection and Net Metering of Customer-Owned Renewable Generation, adopted in 2008, offered an effective means to encourage the development of demand-side renewable energy in the state.

The Commission also established numeric therm savings goals for a natural gas utility for the first time in 2019. In August 2019, the Commission approved 2019-2028 goals for PGS, based upon programs it found were cost-effective.⁶ PGS also developed audit programs for its residential and commercial customers as part of the proceedings. Goalsetting processes for all FEECA utilities are further discussed in Section 2. In 2024, the Commission approved numeric conservation goals for all FEECA utilities for the 2025-2034 period. Next year's FEECA Report (the 2026 version of this report) will be the first year that will summarize the adopted goals and progress made toward achieving those goals.

2024 Achievements and Related Program Costs

Florida utilities have been successful in reducing the growth rates of winter and summer peak electric demand and reducing annual energy consumption. On a cumulative basis through 2024, statewide totals reflect that summer peak demand has been reduced by 8,281 MW, winter peak demand has been reduced by 7,732 MW, and annual energy consumption has been reduced by 11,231 GWh.⁷ During 2024, the electric FEECA utilities offered 103 residential and commercial programs which focused on demand reduction and energy conservation (see Appendices A and B). In addition, FEECA electric utilities performed over 245,000 residential and commercial energy audits in 2024, as shown in Section 3.2. Each FEECA utility's achievements toward the 2024 Commission-approved goals are detailed in Section 3.1.

The Commission has authority, by statute, to allow investor-owned utilities to recover costs related to conservation.⁸ The Commission has implemented this authority for electric IOUs through the ECCR clause since 1980. For 2024, Florida's investor-owned electric utilities recovered approximately \$326.8 million in conservation program expenditures, and the investor-owned natural gas utilities recovered about \$45.0 million in conservation program expenditures.

⁵Order No. PSC-14-0696-FOF-EU, issued December 16, 2014 (2014 Goalsetting Order), in Docket Nos. 20130199-EI through 20130205-EI, *In re: Commission review of numeric conservation goals*.

⁶Order No. PSC-2019-0361-PAA-GU, issued August 26, 2019, in Docket No. 20180186-GU, *In re: Petition for approval of demand-side management goals and residential customer assisted and commercial walk-through energy audit programs, by Peoples Gas System*.

⁷FRCC's 2025 Load & Resource Plan (pp. 64-66). The demand and energy savings from FEECA utility DSM programs are included in these statewide FRCC totals.

⁸Section 366.05(1), F.S.

Conclusion

Conservation in Florida is prompted by customer actions to conserve energy, federal appliance efficiency standards, state building codes for new construction, and utility-sponsored DSM programs. Customers can save energy and reduce their bills through behavioral changes and by investing in energy efficient homes, appliances, and equipment. Federal appliance efficiency standards have become more stringent over time, thus increasing the baseline energy efficiency of new appliances and heating, ventilation, and air conditioning (HVAC) equipment available to Florida's consumers. Likewise, changes in the Florida Building Code (FLBC) have resulted in more energy efficient homes. Florida's electric and natural gas utilities also encourage conservation by offering energy audits, customer education, rebates on energy efficient equipment and building envelope improvements, and demand response programs.

Utilities design DSM programs to encourage the installation of appliances and equipment that exceeds levels set by current building codes and minimum efficiency standards. More stringent efficiency standards and building codes, as well as customer actions to implement efficiency outside of utility programs, reduce the potential incremental demand and energy savings available from utility-sponsored DSM programs. The level of realized savings from utility programs is dependent upon voluntary participation and, in some cases, changes in customer behavior.

Because all customers pay for the utility conservation programs as a portion of their monthly utility bills, the Commission focuses on ensuring that all customers benefit from utility-sponsored DSM programs. The Commission also encourages customers to use energy efficiently through its customer education efforts. Overall, reducing Florida's demand and energy usage for electric customers and therm usage for natural gas customers relies on customer education and participation in utility DSM programs, along with each individual's efforts to save electricity.

Conservation and renewable energy will continue to play an important role in Florida's energy future. The Commission is continuing its efforts to encourage cost-effective conservation that defers the need for new electric-generating capacity and reduces the use of fossil fuels. These initiatives support a balanced mix of resources that reliably and cost-effectively meet the needs of Florida's ratepayers.

Section 1. Florida Energy Efficiency and Conservation Act

1.1 FEECA History and Implementation

FEECA emphasizes four key areas: reducing the growth rates of weather-sensitive peak demand and electricity usage, increasing the efficiency of electricity and natural gas production and use, encouraging demand-side renewable energy systems, and conserving expensive resources, particularly petroleum fuels. Pursuant to FEECA, the Commission is required to establish appropriate goals and the FEECA utilities must develop DSM programs to meet those goals.

Upon enactment in 1980, all electric utilities in Florida were subject to FEECA. In 1989, changes were made to the law limiting the requirement to electric utilities with more than 500 gigawatt-hours (GWh) of annual retail sales. At that time, 12 Florida utilities met this threshold requirement and their combined sales accounted for 94 percent of Florida's retail electricity sales. An additional change to the law encouraged cogeneration projects.

In 1996, the Florida Legislature raised the minimum retail sales threshold for municipal and cooperative electric utilities to 2,000 GWh. Retail sales for these utilities were fixed as of July 1, 1993, and two municipal utilities met the threshold of the amended statute: JEA and OUC. In addition to these two utilities, all four Florida investor-owned electric utilities must comply with FEECA regardless of sales levels. No rural electric cooperatives met the retail sales threshold of the amended statute.

FEECA also includes natural gas utilities whose annual retail sales volume is equal to or greater than 100 million therms. PGS is the only natural gas utility that meets the therm sales threshold for conservation goals under FEECA, and thus has its own Commission-approved DSM goals.

The statute also allows the Commission to provide appropriate financial rewards and penalties to the utilities over which it has rate-setting authority. The Commission also has the authority to allow an IOU to receive an additional return on equity of up to 50 basis points for exceeding 20 percent of its annual load growth through energy efficiency and conservation measures. To date, the Commission has not awarded financial rewards or assessed penalties for any of the IOUs through FEECA. The Commission does not have rate-setting authority over JEA and OUC and therefore cannot assess financial penalties or provide financial rewards under its authority.

Table 1 lists the six electric FEECA utilities' 2024 retail electricity sales and the percentage of total statewide electricity sales by each utility. The table also includes the total energy sales for all non-FEECA utilities. Currently, the six electric utilities that are subject to FEECA account for approximately 83.3 percent of all Florida energy sales.

Table 1
Energy Sales by Florida's Electric FEECA Utilities (2024)

Florida's Electric FEECA Utilities	Energy Sales (GWh)	Percent of Total Energy Sales
Florida Power & Light Company	129,386	50.8%
Duke Energy Florida, LLC	41,132	16.2%
Tampa Electric Company	20,702	8.1%
JEA	12,873	5.1%
Orlando Utilities Commission	7,329	2.9%
Florida Public Utilities Company	655	0.3%
Electric FEECA Utilities' Total	212,075	83.4%
Non-FEECA Utilities' Total	42,564	16.6%
Total Statewide Energy Sales	254,639	100.0%

Source: FPSC's *Statistics of the Florida Electric Utility Industry* (Table 26), published October 2025.

Sections 366.82(2) and 366.82(6), F.S., require the Commission to set goals at least every five years for the utilities subject to FEECA. The Commission sets electric goals with respect to summer and winter electric-peak demand and annual energy savings over a ten-year period, with a re-evaluation every five years. Once goals are established, the electric FEECA utilities must submit DSM plans containing programs intended to meet the goals for Commission approval.

In 2008, the Florida Legislature amended the FEECA statute, placing upon the Commission additional responsibilities when adopting conservation goals. These responsibilities included the consideration of the benefits and costs to program participants and ratepayers as a whole, as well as the need for energy efficiency incentives for customers and utilities. The Commission must also consider any costs imposed by state and federal regulations on greenhouse gas emissions.

1.2 FEECA's Influence on the Florida Energy Market

FEECA's mission is important to Florida's overall energy market. Florida's total electric consumption ranks among the highest in the country due to its sizeable population and climate-induced demand for cooling. When compared to the rest of the country, Florida's energy market is unique. The distinction is largely due to the state's climate, the high proportion of residential customers to total customers, and the significant reliance on electricity for heating and cooling.

Florida is typically a summer-peaking state, since the summer peak demand generally exceeds winter peak demand. On a typical summer day, the statewide demand for electricity can increase significantly over a span of hours.⁹ Additionally, 88.6 percent of Florida's electricity customers are residential and consume 54.2 percent of the electrical energy produced. In contrast, nationally, residential customers account for 37.6 percent of total electric sales, while commercial customers represent 36.2 percent of electric consumption, and industrial customers

⁹FPSC's *Review of the 2024 Ten-Year Site Plans of Florida's Electric Utilities* (December 2025).

represent 26.0 percent.¹⁰ Table 2 shows the makeup of Florida’s electric customers by class and consumption.

Table 2
Florida's Electric Customers by Class and Consumption (2024)

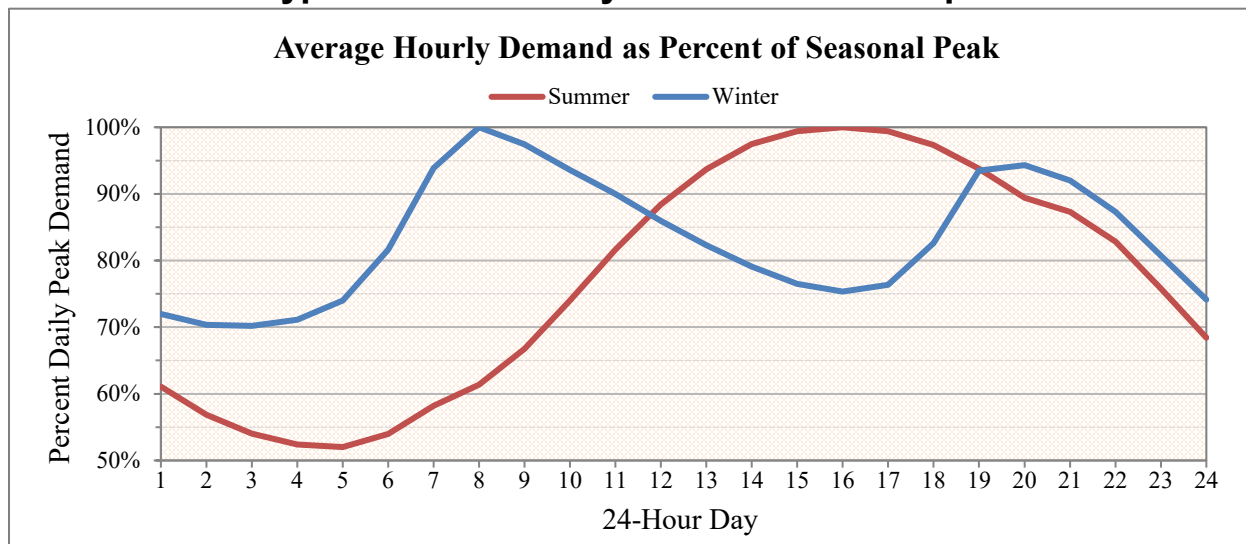
Customer Class	Number of Customers	Percent of Customers	Energy Sales (GWh)	Percent of Sales
Residential	10,534,238	88.6%	137,955	54.2%
Commercial	1,263,694	10.6%	93,596	36.8%
Industrial	20,990	0.2%	16,819	6.6%
Other*	77,233	0.6%	6,269	2.4%
Total	11,896,155	100.0%	254,639	100.0%

*Street and highway lighting, sales to public authorities, and interdepartmental sales.

Source: FPSC's *Statistics of the Florida Electric Utility Industry* (Tables 26 and 33), published October 2025.

Figure 1 shows the daily electric load curves for typical Florida summer and winter day. In the summer, air conditioning demand starts to increase in the morning and peaks in the early evening; a pattern which aligns with the sun’s heating of buildings. In comparison, the winter load curve has two peaks—the largest in mid-morning, followed by a smaller peak in the late evening—which correspond to heating loads.

Figure 1
Typical Florida Daily Electric Load Shapes



Source: FPSC's *Review of 2024 Ten-Year Site Plans of Florida’s Electric Utilities* published December 2025.

¹⁰National data as reported for 2024 by the U.S. Energy Information Administration in the annual *Electric Sales, Revenue, and Average Price (ESR)* report (Table 2): https://www.eia.gov/electricity/sales_revenue_price/

Residential load patterns shift rapidly and have high peak-to-trough variation. In contrast, commercial or industrial loads demonstrate more consistency throughout the 24-hour day and experience fewer spikes in demand.

Utilities dispatch additional generating capacity throughout the day in order to follow the customer load patterns. Peaking generating units, which are dispatched during high demand periods of the day, are less fuel-efficient than baseload or intermediate generating units. Utility DSM programs play a role in reducing energy usage and shifting peak demand, thus reducing the need to dispatch fuel-inefficient generating units.¹¹ Over time, the need for additional generating capacity has increased in Florida, largely due to population growth. In addition to providing fuel savings at existing generating units, utility-sponsored DSM programs and individual consumer conservation efforts can avoid or defer the need for new electric generating capacity.

Utility-sponsored DSM programs are funded by all ratepayers. Therefore, in order to meet FEECA requirements, the Commission and utilities must ensure that the DSM programs created to reap the benefits of reduced fuel usage and deferred generating capacity are cost-effective, i.e. less costly than generation. The Commission's methodologies to determine the cost-effectiveness of demand-side management programs are explained in detail in Section 2.1.

Since its enactment, implementation of FEECA has been successful in reducing the growth rate of weather-sensitive electric peak demands, and in conserving expensive resources. These savings have avoided or deferred the need for new generating capacity and offset the use of existing generating units, resulting in savings of fuel, as well as variable operations and maintenance (O&M) costs. In 2024, FEECA utility DSM programs continued contributing to the reduction of statewide energy needs and deferred the need for new generating capacity. Table 3 details statewide cumulative savings for summer peak demand, winter peak demand, and overall energy consumption through 2024, as reported in the Florida Reliability Coordinating Council's (FRCC) 2025 Regional Load & Resource Plan.¹² In 2024, the FEECA DSM programs contributed annual energy savings of 264.8 GWh, which is enough electricity to power approximately 19,933 homes for a year.¹³

¹¹Electric generating units are typically categorized as baseload, intermediate, or peaking. Aside from planned and forced outages, baseload units are scheduled to operate continuously. Intermediate units generate power to follow load for periods of time, but are not planned to operate nonstop. Peaking units supplement baseload and intermediate power, operating during high-demand, or peak periods.

¹²The cumulative MW savings for summer peak demand and winter peak demand shown in Table 3 reflect the maximum capability of demand response programs.

¹³This estimate is based on an average annual household energy use of 13,284 kWh for Florida in 2024 as reported by the U.S. Energy Information Administration in the annual *Electric Sales, Revenue, and Average Price (ESR)* report (Table 5.a): https://www.eia.gov/electricity/sales_revenue_price/

Table 3
Statewide Cumulative Demand and Energy Savings (1980-2024)

Type	Achieved Reduction
Summer Peak Demand	8,281 MW
Winter Peak Demand	7,732 MW
Annual Energy Reduction	11,231 GWh

Source: Florida Reliability Coordinating Council's *2025 Regional Load & Resource Plan* (pp. 64-66).

In 2024, the electric FEECA utilities offered 99 programs for residential, commercial, and industrial customers (see Appendices A and B). Programs focus on either reducing energy use at a given moment, which shifts/reduces demand, or toward reducing overall energy consumption over a period of time. Utility-sponsored DSM programs are an important means of achieving demand and energy savings and these programs are designed to encourage customer conservation efforts.

Additionally, residential energy audits, required by Section 366.82(11), F.S., serve as an avenue to identify and evaluate conservation opportunities for customers, including their potential participation in utility-sponsored DSM and conservation programs. Energy audits also educate customers about behavioral changes and energy efficiency investments they can make outside of utility-sponsored DSM programs. During 2024, FEECA electric utilities performed 239,519 residential audits. Though FEECA does not require commercial energy audits, FEECA electric utilities also performed 6,003 commercial energy audits in 2024. Additional information about these results is presented in Section 3.

1.3 Recovery of Conservation Expenditures

The IOUs are allowed by Commission Rule 25-17.015, F.A.C., to recover reasonable expenses for DSM programs through the ECCR clause. Such expenses may include administrative costs, equipment, and incentive payments. Before petitioning the Commission to recover costs through the ECCR clause, a utility must provide data on DSM program cost-effectiveness. Utilities must have Commission approval for any new programs or program modifications prior to seeking cost recovery.

Commission Rule 25-17.015, F.A.C., also permits natural gas LDCs to seek recovery for costs related to Commission-approved conservation programs. While PGS is the only natural gas utility subject to FEECA, the other Florida LDCs offer Commission-approved DSM programs without a specific therm savings goal. Natural gas conservation programs have historically focused on providing rebates to residential customers that support the replacement of less efficient appliances with new, energy-efficient gas appliances. However, several LDCs have expanded their rebate programs to commercial customers.¹⁴

On an annual basis, the Commission conducts financial audits of DSM program expenses that are included in the electric IOUs' and LDCs' cost recovery requests. A full evidentiary hearing is

¹⁴Order No. PSC-14-0039-PAA-EG, issued January 14, 2014, in Docket No. 130167-EG, *In re: Petition for approval of natural gas energy conservation programs for commercial customers, by Associated Gas Distributors of Florida*.

held to determine the cost recovery factors to be applied to customer bills in the following year. The Commission-approved 2026 conservation cost recovery factors are discussed further in Section 4.

Section 2. DSM Goalsetting

2.1 DSM Program Cost-Effectiveness and Energy Savings

Section 366.81, F.S., emphasizes that it is critical to utilize cost-effective conservation. This statutory provision is codified in Rule 25-17.008, F.A.C., for electric utilities and Rule 25-17.009, F.A.C., for natural gas LDCs. The rules identify the cost-effectiveness methodologies to be used and require that utilities provide cost and benefit information to the Commission when requesting to add a program or make changes or additions to an existing program.

The Commission requires that electric utilities measure cost-effectiveness from three perspectives, the program participant, the utility's ratepayers, and society's overall cost for energy services. The Participants test, the Rate Impact Measure (RIM) test, and the Total Resource Cost (TRC) test capture these viewpoints. The electric FEECA utilities are required to provide the results of all three tests when seeking to add a new program or make changes to an existing program.

Similarly, Rule 25-17.009, F.A.C., requires natural gas LDCs to provide the results of the Participants test and Gas Rate Impact Measure Test (GRIM). The GRIM test is a modified version of the RIM test, specific to gas utilities. Natural gas LDCs are also required to provide the results of these tests when seeking to add a new program or modify an existing program.

Table 4 summarizes the costs and benefits considered in the three Commission-approved electric cost-effectiveness methodologies for electric utilities.

Table 4
Summary of Electric Cost-Effectiveness Methodologies

	Participants	RIM	TRC
Benefits			
Bill Reduction	X		
Incentives Received	X		
Avoided Generation (Capital and O&M)		X	X
Avoided Transmission (Capital and O&M)		X	X
Fuel savings		X	X
Costs			
Program Costs		X	X
Incentives Paid		X	
Lost Revenues		X	
Participant's Costs (Capital and O&M)	X		X

Participants Test

The Participants test analyzes costs and benefits from a program participant's point of view, rather than the impact on the utility and other ratepayers not participating in the program. The

Participants test includes the up-front costs customers pay for equipment and costs to maintain this equipment. Benefits considered in the test include the incentives paid by utilities to the customers and the reduction in customer bills. Failure to demonstrate cost-effectiveness under this test would infer that rational customers would not elect to participate in this program.

Rate Impact Measure (RIM) Test

The RIM test is designed to ensure that all ratepayers, not just the program's participants, will benefit from a proposed DSM program. The RIM test includes the costs associated with incentive payments to participating customers and decreased revenues to the utility. DSM programs can reduce utility revenues due to reduced kilowatt-hour (kWh) sales and reduced demand. The decreased utility revenues typically are recovered from the general body of ratepayers at the time of a rate case. A DSM program that passes the RIM test ensures that all customer rates are the same or lower than rates would be without the DSM program.

Total Resource Cost (TRC) Test

The TRC test measures the overall economic efficiency of a DSM program from a social perspective. This test measures the net costs of a DSM program based on its total costs, including both the participants' and the utility's costs. Unlike the RIM test, customer incentives and decreased utility revenues are not included as costs in the TRC test. Instead, these factors are treated as transfer payments among ratepayers. Moreover, if appropriate, certain external costs and benefits such as environmental impacts may be taken into account. Because incentives and foregone revenues are not treated as "costs," electric rates for all customers tend to be higher for programs implemented solely using the TRC test to judge cost-effectiveness.

Ensuring Cost-Effectiveness

Ensuring utility-sponsored DSM programs remain cost-effective benefits the general body of electric ratepayers. These programs can reduce costs to ratepayers by postponing capital expenditures such as future power plant construction, and reducing current electrical generation costs, including fuel and variable O&M costs. DSM programs can also benefit customers by improving reliability.

When an IOU determines that a DSM program is no longer cost-effective, the utility should petition the Commission for modification or discontinuation of the program. In many instances, programs may need to be modified due to the adoption of a more stringent appliance efficiency standard or building code. In contrast, if new efficiency measures become available that are cost-effective, the utility may petition the Commission for approval of a new program.

2019 and 2024 Electric DSM Goalsetting Proceedings

Pursuant to Sections 366.82(2) and 366.82(6), F.S., the electric FEECA utilities filed proposed goals for the 2020 through 2029 period in April 2019. In that proceeding, the utilities' proposed goals were lower overall than those established in the 2014 goalsetting proceeding, with some utilities proposing goals of zero or near-zero for the 10-year period. A technical hearing on the proposed goals was held on August 12 and 13, 2019. The Commission heard testimony on cost-effectiveness tests, whether a goal of zero fulfilled statutory requirements, how to account for free ridership, and how to ensure low-income customers are able to effectively participate in DSM programs.

By issuing Order No. PSC-2019-0509-FOF-EG¹⁵ on November 26, 2019, the Commission rejected the goals proposed by the electric FEECA utilities and chose to continue with the 2020-2024 portion of the goals established in the 2014 goalsetting proceeding.¹⁶ While the goalsetting process produces annual goals, the cumulative goals for the entire 10-year period are shown in Table 5A for illustrative purposes.

Table 5A
Cumulative Commission-Approved Electric DSM Goals (2015-2024)

Electric Utility	Summer Demand Reduction Goals (MW)	Winter Demand Reduction Goals (MW)	Annual Energy Reduction Goals (GWh)
FPL	526.1	324.2	526.3
DEF	259.1	419.3	195.0
TECO	56.3	78.3	144.3
Gulf	68.1	36.7	84.2
FPUC	1.3	0.4	2.0
OUC	5.0	8.4	13.0
JEA	10.8	9.7	25.8
Total	926.7	877.0	990.6

Source: Order No. PSC-14-0696-FOF-EU.

In the 2019 goalsetting proceeding, the Commission also expressed a desire to review the goalsetting process for potential revisions that could be implemented before the next goalsetting proceeding (2024). In July 2020, a docket was established to consider proposed amendments to Rule 25-17.0021, F.A.C.¹⁷ On May 17, 2023, a rule certification packet was forwarded to the Administrative Code and Register Section of the Florida Department of State. The Commission rule, Rule 25-17.0021, F.A.C, provides the electric FEECA utilities with direction as to what to file in order for the Commission to evaluate DSM goals and programs. Rule 25-17.0021, F.A.C., provides that: (1) utilities should make goals based upon projected savings from potential programs offered to customers rather than upon aggregated savings from individual conservation measures; and (2) requires utilities to provide projected savings or goals developed under two cost-effectiveness scenarios in order to provide a more robust record of evidence. Specifically, the rule brings into the goal-setting phase a greater focus on potential conservation programs that could be offered to customers in order to reach a utility's approved goals.¹⁸

¹⁵Order No. PSC-2019-0509-FOF-EG, issued November 26, 2019, in Docket Nos. 20190015-EG through 20190021-EG, *In re: Commission review of numeric conservation goals*.

¹⁶The goals established in 2014, and continued with the Commission's decision in the 2019 goalsetting proceeding, were based upon estimated energy and demand savings from measures that passed under a single cost effectiveness scenario, based upon the RIM and Participants cost-effectiveness tests.

¹⁷See Docket No. 20200181-EU, Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities.

¹⁸Order No. PSC-2023-0165-FOF-EU, Notice of Adoption of Rule, issued May 18, 2023, in Docket No. 20200181-EU, *In re: Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities*.

In January 2024, dockets were opened for the 2024 DSM goalsetting proceeding to establish goals for the 2025 through 2034 time period.¹⁹ In September 2024, the Commission approved the numeric conservation goals to be applicable beginning in 2025 for DEF, TECO, FPUC, JEA, and OUC.²⁰ In December 2024, the Commission approved the numeric conservation goals for FPL.²¹ The cumulative goals for the entire 10-year period are shown in Table 5B for informational purposes.

Table 5B
Cumulative Commission-Approved DSM Goals (2025-2034)

Electric Utility	Summer Demand Reduction Goals (MW)	Winter Demand Reduction Goals (MW)	Annual Energy Reduction Goals (GWh)
FPL	454.7	336.6	1,010.5
DEF	300.0	373.0	582.0
TECO	150.0	198.8	434.1
FPUC	0.9	1.8	6.1
OUC	7.8	7.1	55.5
JEА	19.9	17.9	101.4
Total	933.3	935.2	2,189.6

Source: Goal approval orders, by utility, are identified in footnotes 20 and 21 below.

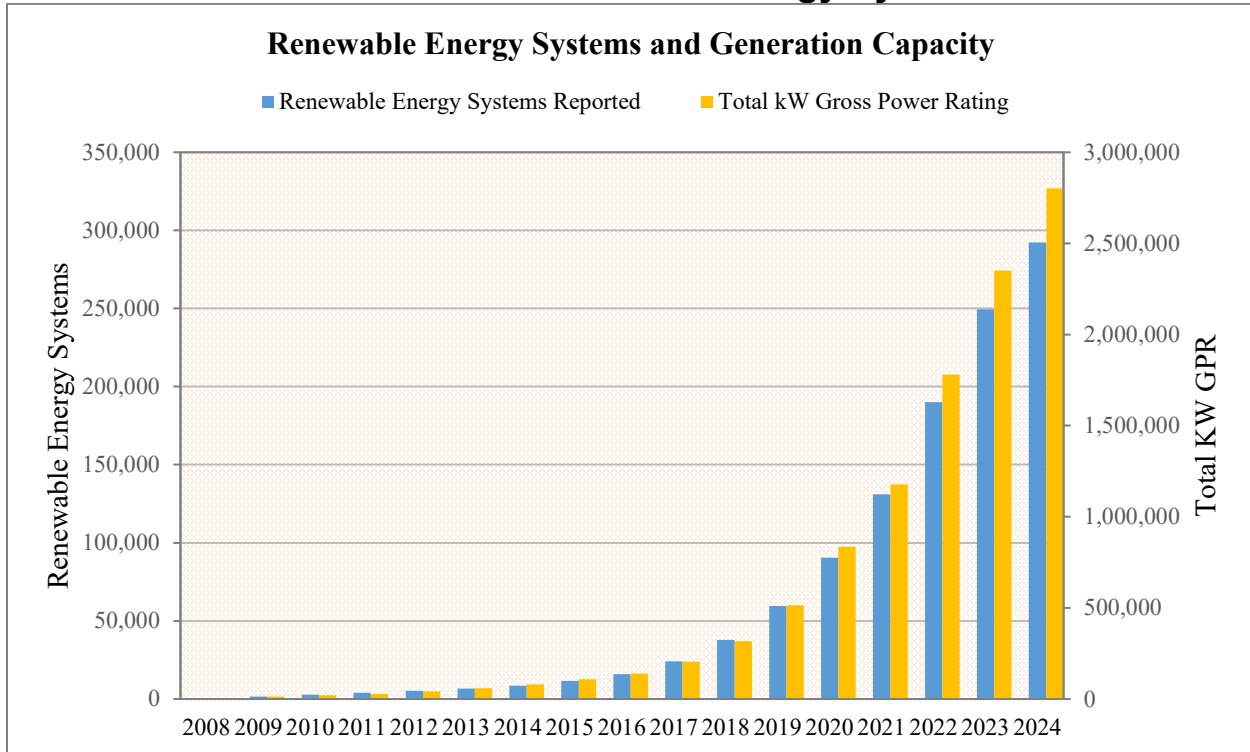
As part of its review of goals, the Commission recognized that Rule 25-6.065, F.A.C., (Customer-Owned Renewable Generation Rule) is an effective means of encouraging the development of demand-side renewable energy systems. Figure 2 shows the growth in the number of customer-owned renewable energy systems in Florida, as well as the growth in gross power ratings (i.e., generating capacity) since the Commission revised its net-metering rule in 2008. In 2024, the total number of renewable energy systems reported was 292,284, with a total gross power rating of 2,801,263 kilowatts.

¹⁹See Docket Nos. 20240012-EG through 20240017-EG, Commission review of numeric conservation goals (for FPL, DEF, TECO, FPUC, JEA, and OUC).

²⁰See Order No. PSC-2024-0429-FOF-EG, issued September 20, 2024, in Docket No. 20240013-EG, *In re: Commission review of numeric conservation goals (Duke Energy Florida, LLC)*; Order No. PSC-2024-0430-FOF-EG; issued September 20, 2024, in Docket No. 20240014-EG, *In re: Commission review of numeric conservation goals (Tampa Electric Company)*; Order No. PSC-2024-0431-FOF-EG; issued September 20, 2024, in Docket No. 20240015-EG, *In re: Commission review of numeric conservation goals (Florida Public Utilities Company)*; Order No. PSC-2024-0432-FOF-EG, issued September 20, 2024, in Docket No. 20240016-EG, *In re: Commission review of numeric conservation goals (JEA)*; and Order No. PSC-2024-0433-FOF-EG, issued September 20, 2024, in Docket No. 20240017-EG, *In re: Approving numeric conservation goals (Orlando Utilities Commission)*.

²¹See Order No. PSC-2024-0505-FOF-EG, issued December 18, 2024, in Docket No. 20240012-EG, *In re: Commission review of numeric conservation goals (Florida Power & Light Company)*.

Figure 2
Demand-Side Renewable Energy Systems



Source: Data compiled from Net Metering Summary Spreadsheet (Net Metering Reports) provided to the Commission from IOU, municipal, and rural electric cooperative electric companies, 2008-2024.

2.2 2019 and 2024 DSM Goalsetting Proceedings for Peoples Gas

PGS is the only natural gas utility that meets the therm sales threshold for establishing conservation goals under FEECA.²² In October 2018, PGS filed a petition for approval of numeric therm reduction goals for the 2019-2028 period. PGS estimated its goals based upon its current Commission-approved DSM programs. Because PGS had existing programs already in place, there is expected to be no additional cost to its customers, aside from the costs of the new audit programs. PGS utilized the Participants and GRIM tests to calculate its goals.²³ The Commission first approved the goals for PGS in Order No. PSC-2019-0361-PAA-GU, issued on August 26, 2019. Table 6A shows the 10-year therm-savings goals for PGS over the 2019 through 2028 period.²⁴

²²Section 366.82, F.S., provides that a natural gas utility is subject to FEECA requirements if a utility's annual retail sales volume is equal to or greater than 100 million therms.

²³Rule 25-17.009, F.A.C., requires natural gas utilities that seek to recover costs for conservation programs to file the cost-effectiveness test results of the Participants test and the GRIM test.

²⁴Order No. PSC-2019-0361-PAA-GU, issued August 26, 2019, in Docket No. 20180186-GU, *In re: Petition for approval of demand side management goals and residential customer assisted and commercial walk-through energy audit programs, by Peoples Gas System*.

Table 6A
Commission-Approved DSM Goals for PGS (2019-2028)

Cumulative Savings (Therms)		
Residential	Small Commercial	Combined
3,749,583	2,426,634	6,176,217

Source: Order No. PSC-2019-0361-PAA-GU.

A Commission docket was established in 2024 to set goals for PGS for the same period as was established for the FEECA electric utilities (2025 through 2034 period).²⁵ In the 2024 PGS goalsetting proceeding, PGS estimated its goals for 2025 through 2034 based upon the same Commission-approved DSM programs that were approved in the 2019 goalsetting proceeding. PGS utilized the Participants and GRIM cost effectiveness tests to calculate its goals.²⁶ The Commission approved the 2025-2034 goals for PGS in Order No. PSC-2024-0280-PAA-GU, issued on July 30, 2024.²⁷ Table 6B details the Commission-approved cumulative savings goals for PGS for the 2025-2034 period.

Table 6B
Commission-Approved DSM Goals for PGS (2025-2034)

Cumulative Savings (Therms)		
Residential	Small Commercial	Combined
3,634,183	4,388,865	8,023,048

Source: Order No. PSC-2024-0280-PAA-GU.

2.3 Impact of Outside Factors on FEECA Utility DSM Programs

Conservation in Florida is prompted by customer actions to conserve energy, federal appliance efficiency standards, state building codes, and utility-sponsored DSM programs. Customers can save energy and reduce their bills through behavioral changes and by investing in energy efficient homes, appliances, and equipment. Federal appliance efficiency standards have become more stringent over time, thus increasing the baseline energy efficiency of new appliances and heating and air conditioning equipment available to Florida's consumers. Likewise, changes in the Florida State Building Code (FLBC) have resulted in more energy efficient homes.

Utilities design DSM programs to encourage conservation that exceeds levels achievable through current building codes and minimum efficiency standards. However, the cost-effectiveness of some DSM measures has declined due to several factors outside of the FEECA utilities' control. More stringent state and federal efficiency standards, building codes, and customer actions to implement efficiency outside of utility programs, such as the deployment of renewable energy

²⁵See Docket No. 20240018-EG, Commission review of numeric conservation goals (Peoples Gas System). For the FEECA electric utilities, Rule 25-17.0021(1), F.A.C., sets forth that the Commission will initiate a proceeding at least once every five years to establish goals over a ten-year period.

²⁶Rule 25-17.009, F.A.C., requires natural gas utilities that seek to recover costs for conservation programs to file the cost-effectiveness test results of the Participants test and the GRIM test.

²⁷Order No. PSC-2024-0280-PAA-GU, issued July 30, 2024, in Docket No. 20240018-EG, *In re: Commission review of numeric conservation goals (Peoples Gas System.)*

systems, reduce the potential incremental demand and energy savings available from utility-sponsored DSM programs.

Federal efficiency standards and state building codes establish a baseline in assessing the cost-effectiveness of a potential DSM program. Florida utility DSM programs offer rebates and incentives for appliances that exceed federally established minimum efficiency standards. However, increases in federal efficiency standards, independent conservation efforts by consumers, and general conservation practices make it more challenging for utilities to attract voluntary participants in order to achieve demand and energy savings through DSM programs. Electric rates are also a contributing factor in customers' decisions to enroll or not enroll in DSM programs, or invest in more efficient appliances. Increasing electric rates tend to increase customer energy efficient investments, while stable or declining electric rates tend to reduce customer energy efficiency investments. In combination, these factors make it crucial that the FEECA utilities frequently evaluate their conservation program offerings to ensure that they remain cost-effective and attractive to customers. In addition, the FEECA utilities are also expected to engage in research or evaluate the potential for new, cost-effective DSM program opportunities as energy-efficiency technologies develop.

State Building Code

At the state level, the FLBC is amended annually to incorporate interpretations and clarifications as well as to update efficiency standards. The Florida Building Commission updates the FLBC with relevant new standards every three years, most recently in 2023 when the 8th Edition was issued. The 8th Edition (2023) became effective in December 2023, and three Supplements were issued in 2024.²⁸ While there were several changes in the three supplement documents that pertain to construction standards, no changes were made to Chapter 11, Energy Efficiency. After review of these resources and the current DSM programs, FEECA utilities reported that no program changes were needed as a direct result of the 2023 or 2024 FLBC code updates.

Federal Government Efficiency Standards

At the federal government level, the U.S. Department of Energy's (DOE) Building Technologies Office sets energy efficiency standards for more than 60 categories of appliances and other equipment, including HVAC equipment.²⁹ Within the Building Technologies Office, the Appliances and Equipment Standards Program maintains a multi-year rulemaking schedule that establishes minimum energy efficiency standards and test procedures which are the basis for these standards. The products regulated by DOE standards represent about 90 percent of home, 60 percent of commercial building, and 30 percent of industrial energy use.³⁰ Some of the consumer products regulated by these Conservation Standards and Test Procedures include laundry appliances, dishwashers, microwave ovens, televisions, and several other common

²⁸The 2024 Supplements to the 8th Edition added code language for consistency with changes in laws that became effective August 19, 2024. Details of the Eighth Edition (2023) Florida Building Code and all Supplements to it can be found at https://www.floridabuilding.org/fbc/Links_to_Code_Resources.html.

²⁹Pursuant to Section 553.975, F.S., the Commission must report the effectiveness of state energy conservation standards established by Sections 553.951-553.973, F.S. Florida's appliance efficiency standards are mandatory efficiency improvements but have not been updated since 1993, and therefore have likely been superseded by more recent federal efficiency standards.

³⁰Federal Appliance and Equipment Standards Program: <https://www.energy.gov/eere/buildings/appliance-and-equipment-standards-program>

household products. In addition to consumer products, there are categories for lighting, plumbing, and commercial/industrial products.³¹

The 2024 period did not see many efficiency standards implemented, but it did experience a wide range of standards finalized that will become effective in the coming years. For example, efficiency standards were updated for gas and electric cooking products,³² residential water heaters,³³ and air conditioners. Federal standards that change the baseline requirements for a product may have a direct effect on DSM programs. If a DSM program is no longer cost effective as a result of changing federal standards, then the utility should file a petition to modify or discontinue the program. A utility can update program standards without filing a petition.

In early 2025, DOE finalized a revised test procedure under Appendix M1 for residential central air conditioners and heat pumps, incorporating updated metrics. Although these metrics lay the groundwork for future efficiency standards, DOE postponed the development of corresponding conservation standards. The revised test procedure became mandatory for manufacturers on July 7, 2025.³⁴ DOE also formally withdrew or postponed multiple previously proposed or finalized energy efficiency standards. Among the withdrawn rules were standards for electric motors, ceiling fans, dehumidifiers, and external power supplies. DOE also postponed the effective dates of test procedures for central air conditioners and heat pumps, walk-in cooler systems, and gas instantaneous water heaters, citing the need to reevaluate the rulemakings in light of administrative priorities.³⁵ In May 2025, DOE proposed (but had not yet finalized) withdrawing the covered product determination for portable air conditioners. As of July 2025, DOE has not confirmed whether existing standards for lamps or conventional ovens will be rescinded.³⁶ DOE also initiated new rulemakings for commercial clothes washers, furnace fans, and other equipment categories.³⁷

³¹Federal Conservation Standards and Test Procedures: <https://energy.gov/eere/buildings/standards-and-test-procedures>

³²Official January 29, 2024 Department of Energy press release: <https://www.energy.gov/articles/doe-finalizes-cost-saving-efficiency-standards-new-cooking-products-based-recommendations?>

³³Official April 30, 2024 Department of Energy press release: <https://www.energy.gov/articles/doe-finalizes-efficiency-standards-water-heaters-save-americans-over-7-billion-household?>

³⁴Federal Register Final Rule: Appendix M1 Test Procedure for Central Air Conditioners and Heat Pumps <https://www.federalregister.gov/documents/2025/01/07/2024-30852/energy-conservation-program-test-procedure-for-central-air-conditioners-and-heat-pumps>

³⁵Official March 24, 2025 Department of Energy press release: <https://www.energy.gov/articles/energy-department-advances-efforts-lower-costs-and-increase-consumer-choice?>

³⁶Federal Register: Proposed Withdrawal of Portable Air Conditioners Determination: <https://www.federalregister.gov/documents/2025/05/16/2025-08577/energy-conservation-program-proposed-withdrawal-of-determination-of-portable-air-conditioners-as-a>

³⁷DOE Standards and Test Procedures Overview: <https://energy.gov/eere/buildings/standards-and-test-procedures>

Section 3. FEECA Utilities' Goal Achievements

3.1 Assessing Goal Achievement

Commission rules require separate goals be set for electric residential and commercial/industrial (C/I) classes, assigning context to measuring goal achievement within these two primary customer categories. Each utility's achievements in these categories are also combined and compared against total demand and energy savings goals.

Every FEECA utility must file an annual DSM report pursuant to Rule 25-17.0021, F.A.C., which summarizes demand savings, energy savings, and customer participation rates for each approved program. The report also includes the residential, C/I, and total energy efficiency achievements compared to the approved DSM goals. Each FEECA utility's current (2024) and archived annual DSM reports from prior years can be found on the Commission's website: <http://www.psc.state.fl.us/>.

Monitoring annual goal achievements enables the Commission to evaluate the effectiveness of each utility's programs. In addition to reviewing the FEECA utilities' annual DSM reports, staff issues discovery requests for additional information from the utilities on their demand and energy saving achievements. Staff's data requests also seek explanations of factors preventing the utilities from achieving projected participation levels. Each FEECA utility's DSM performance in 2024 is discussed below. The utility achievements have been compared to the annual goals established by the Commission in November 2014 and reapplied in November 2019. Table 7 provides a breakdown of each electric utility's goal achievements for the period.

FPL

FPL exceeded 4 of 9 DSM demand and energy savings goals in 2024. For the residential customer class, higher participation in all programs aided FPL in exceeding its goal for annual energy savings, yet the utility still did not achieve its summer or winter demand reduction goals for the class. FPL cited lower participation than anticipated in the Residential On Call program, and lower savings in the Residential HVAC program due to new Federal Efficiency Standards were the principle reasons the demand reduction goals were not met. For the C/I customer class, FPL's goal achievement results were reversed; while the utility exceeded its summer and winter demand reduction goals for the class, it fell short of its C/I annual energy savings goals. For the commercial/industrial class shortfall, FPL cites lower participation than anticipated in the Business Lighting program, which contributed to it not achieving its annual energy savings goal for the commercial/industrial class. The utility believes program changes that are incorporated in its 2025 DSM plan, plus enhanced marketing efforts to promote its energy saving programs, will enhance its performance for meeting all goals.

DEF

In 2024, DEF exceeded all individual customer class and overall goals. For the residential customer class, demand and energy savings amounts were somewhat lower than those achieved in 2023. DEF conducted fewer residential energy audits in 2024 (29,423), compared to 2023 (36,915). For the C/I customer class, the company exceeded all its individual customer class goals, despite conducted only about 70% as many C/I audits (325) compared to 2023 (479).

TECO

In 2024, TECO exceeded all individual customer class and overall goals. Although TECO exceeded all 2024 residential savings goals, several programs reported lower participation levels. For the residential and C/I classes, fewer audits were conducted in 2024, compared to 2023 (55,659 for residential and 459 for C/I in 2024, compared to 104,284 residential and 976 C/I, in 2023). For the C/I customer class, program participation levels were mixed compared to 2023, but increased participation in the Facility Energy Management System program contributed to the reported annual energy savings result.

FPUC

In 2024, FPUC exceeded 2 of 9 DSM demand and energy savings goals in 2024. The utility did not meet or exceed 7 out of its 9 goals, including its summer demand goal for the residential class, all of its goals for the C/I customer class, and all total goals. Fewer residential audits were conducted in 2024 compared to 2023, and participation was flat in the Residential Heating and Cooling Upgrade program. For 2025, FPUC expects that the higher rebate levels for residential programs in their 2025 DSM plan will spark interest in these programs, and aid the utility in meeting its customer class goals. For the C/I customer class, participation in 2024 improved compared with 2023, but not to a level sufficient for the company to achieve its demand and energy savings goals. FPUC attributes underperformance in the commercial class to low participation in all three of its primary programs (the Commercial Heating & Cooling Upgrade program, the Commercial Chiller program, and the Commercial Reflective Roof program). For 2025, FPUC is optimistic that program adjustments in their 2025 DSM plan, along with a new C/I lighting program, will contribute to more favorable goal achievement results for this customer class in future years.

JEA

JEA exceeded all individual customer class goals in 2024; thus, the utility met its total demand and energy savings goals as well.

OUC

OUC exceeded all individual customer class goals in 2024; thus, the utility met its total demand and energy savings goals as well.

Table 7
Electric DSM Goals Compared to Annual Achievements (2024)

Utility	Winter (MW)		Summer (MW)		Annual (GWh)	
	Goals	Achieved Reduction	Goals	Achieved Reduction	Goals	Achieved Reduction
FPL						
Residential	23.10	21.62	37.80	32.97	37.80	49.37
Commercial/Industrial	<u>18.00</u>	<u>19.13</u>	<u>29.10</u>	<u>32.14</u>	<u>38.10</u>	35.45
Total	41.10	40.75	66.90	65.11	75.90	84.82
DEF						
Residential	21.00	29.00	11.00	18.00	1.00	46.00
Commercial/Industrial	<u>5.00</u>	<u>24.00</u>	<u>5.00</u>	<u>21.00</u>	1.00	<u>9.00</u>
Total	26.00	53.00	16.00	39.00	2.00	55.00
TECO						
Residential	6.10	8.50	2.50	9.80	5.50	22.20
Commercial/Industrial	<u>1.70</u>	<u>9.20</u>	<u>3.20</u>	<u>12.30</u>	<u>9.60</u>	<u>86.50</u>
Total	7.80	17.70	5.70	22.10	15.10	108.70
FPUC*						
Residential	0.039	0.056	0.123	0.096	0.084	0.185
Commercial/Industrial	<u>0.027</u>	0.006	<u>0.071</u>	0.011	<u>0.229</u>	0.003
Total	0.066	0.062	0.194	0.107	0.313	0.188
JEA						
Residential	0.960	1.630	0.940	1.870	2.500	3.670
Commercial/Industrial	<u>0.007</u>	<u>0.250</u>	<u>0.140</u>	<u>0.490</u>	<u>0.080</u>	<u>2.550</u>
Total	0.967	1.880	1.080	2.360	2.580	6.220
OUC						
Residential	0.160	0.710	0.160	0.657	0.570	1.683
Commercial/Industrial	<u>0.700</u>	<u>0.956</u>	<u>0.360</u>	<u>1.352</u>	<u>0.800</u>	<u>8.221</u>
Total	0.860	1.666	0.520	2.009	1.370	9.904

*Bold numbers indicate the utility did not meet its annual goals within that category.

Source: 2024 FEECA utility demand-side management annual reports.

PGS

PGS exceeded its residential therm reduction savings goal by about 21 percent in 2024, and surpassed its C/I and total goals by significant margins.

Table 8 provides a breakdown of the goal achievements for PGS for the period. Therm-savings goals for PGS were first approved in August 2019. PGS met its 2024 total energy reduction goal and its individual customer class goals.

Table 8
Natural Gas DSM Goals Compared to Annual Achievements (2024)

PGS	Annual Energy Reduction, in Therms	
	Goals	Achieved Reduction
Residential	379,045	457,458
Commercial/Industrial	<u>245,457</u>	<u>1,812,827</u>
Total	624,502	2,270,885

*Bold numbers indicate the utility did not meet its annual goals within that category.

Source: 2024 FEECA utility (PGS) demand-side management annual report.

3.2 Information on Audit Programs

Residential energy audits are required by Section 366.82(11), F.S. Energy audits serve as an avenue for utilities to identify and evaluate conservation opportunities for customers. FEECA utilities use energy audits as a gateway to their other DSM programs. For example, some rebate programs require customers to have an energy audit so that the utility can identify existing equipment to determine program eligibility before the customer is eligible to participate. Utilities also use energy audits to educate customers on behavioral changes and energy efficiency investments they can make outside of the utility-sponsored DSM programs.

Rule 25-17.0021, F.A.C., requires that all FEECA utilities offer a Walk-Through Audit, a Building Energy-Efficiency Rating System (BERS) Audit, and a Computer-Assisted Audit to their residential customers. All FEECA electric utilities offer Walk-Through Audits for their commercial customers as well. In addition to the required audits, FEECA utilities also offer online and phone audits which have become increasingly popular with customers. While online and phone audits are not as thorough as Walk-Through Audits, they give customers access to much of the same information on their own time, without the need to schedule appointments with their utility. These audits also typically have lower administrative costs than Walk-Through Audits.

As a part of its goalsetting process, PGS was granted a waiver which exempts the company from the requirement to offer Walk-Through Audits. The Commission allowed PGS to offer an electronic, online-only audit in lieu of on-site audits for residential customers. In April 2020, PGS launched its Residential Customer Assisted Audit program as an online audit program for residential customers. In 2024, a total of 7,442 audits of this type were conducted. In addition, PGS completed its first full year of its Commercial Walk-Through Energy Audit program, after launching the program in July 2023. PGS conducted 153 audits of this type in 2024.

Residential Audits

Table 9 shows FEECA electric utilities performed a total of 239,519 residential audits in 2024, which was about 1,223 fewer residential audits compared to 2023, when 240,742 audits were conducted.³⁸

Table 9
Residential Audits by Type (2024)

Utility	Audit Type			
	Walkthrough, BERS, or Computer Assisted	Online	Phone	Total
FPL	16,452	74,124	9,603	100,179
DEF	6,449	20,736	2,238	29,423
TECO	2,865	52,794	0	55,659
FPUC	108	12	0	120
JEA	5,264	5,742	0	11,006
OUC	1,393	41,739	0	43,132
Total	32,531	195,147	11,841	239,519

Source: FEECA utilities' 2024 demand-side management annual reports.

By type, FEECA electric utilities conducted 32,531 in-person audits in 2024, a decrease relative to 2023, when 36,358 audits of this type were conducted. The overall number of virtual online audits increased in 2024 (195,147) compared to 2023 (188,213). Only FPL and DEF offered virtual audits via telephone and, on an overall basis, fewer audits of this type were conducted in 2024 (11,841) compared to 2023 (16,171).

By utility, FPL, JEA, and OUC reported more audits were conducted on an overall basis (i.e., residential and commercial combined) in 2024 compared to 2023. FPL reported 100,179 audits were conducted in 2024, reflecting more in-person and online audits, which is an increase compared to its 2023 audits (87,050). Likewise, JEA's increase in in-person audits led to more audits overall in 2024 compared to 2023. Unlike 2023, OUC included its online audits in 2024, which resulted in more reported audits in 2024 than 2023. DEF, TECO, and FPUC reported fewer audits in all categories in 2024 compared to 2023.

Commercial / Industrial Audits

On an overall basis, Table 10 below shows that the FEECA electric utilities performed 6,003 commercial/industrial energy audits in 2024, compared to 6,872 such audits in 2023. During periods of COVID-era suspensions that began in 2021, FPL, DEF, and TECO offered C/I audits through in-person and virtual means. However, in 2024, only FPL and DEF continued the practice of offering virtual audits. For TECO, JEA, and OUC, all of the audits conducted for this customer class in 2024 were conducted by site visits (shown on Table 10 as in-person audits). FPUC offers consultation services on energy saving opportunities, but does not offer a formal audit program for commercial/industrial customers.

³⁸Walk-Through, BERS, and Computer-Assisted audits all require a utility auditor to physically inspect the customer's premises, and therefore are consolidated for the purposes of Figures 3 and 4. On a percentage basis, the number of residential audits conducted in 2024 reduced by about 0.5% percent, compared with 2023.

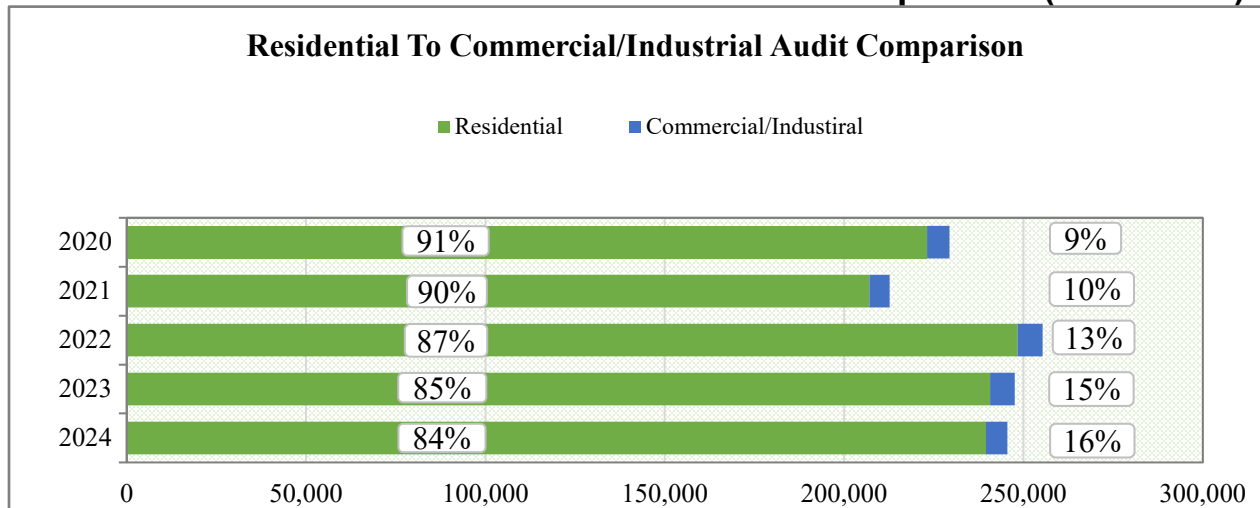
Table 10
Commercial / Industrial Audits by Type (2024)

Utility	Audit Type			
	Walkthrough, BERS, or Computer Assisted	Online	Phone	Total
FPL	2,059	522	2,313	4,894
DEF	298	0	27	325
TECO	459	0	0	459
FPUC	0	0	0	0
JEA	257	0	0	257
OUC	68	0	0	68
Total	3,141	522	2,340	6,003

Source: FEECA utilities' 2024 demand-side management annual reports.

Figure 3 below shows multiple years of data (2020 through 2024) to demonstrate the proportional split between residential and commercial/industrial audits, compared to the total number of audits. In 2020, about 91 percent of all audits were residential, with the balance (about 9 percent) being commercial/industrial. In the years since 2020 (2021 through 2024), a gradual shift to a larger percentage of commercial/industrial audits in each year can be observed, such that by 2024, about 16 percent of all audits conducted were commercial/industrial audits.

Figure 3
Residential To Commercial / Industrial Audit Comparison (2020-2024)



Source: FEECA utilities' 2020-2024 demand-side management annual reports.

3.3 Low-Income Programs

The 2014 DSM Goals Order³⁹ states, “When the FEECA utilities file their DSM implementation plans, each plan should address how the utilities will assist and educate their low-income customers, specifically with respect to the measures with a two-year or less payback.”⁴⁰ In accordance with this Order, electric FEECA utility have implemented measures and/or programs that assist and educate low-income customers. Low-income customer participation in energy conservation programs furthers the intent of FEECA by encouraging potential demand and energy reduction in Florida. Customers that participate in these programs benefit through increased knowledge of conservation opportunities and through rebates on energy saving equipment, resulting in potential bill reduction.

Low-income programs mainly focus on efforts to provide energy efficiency information, weatherization opportunities and the installation of energy efficient measures to residential homes. In many cases, the utilities have established partnerships with government and non-profit agencies. They work together to help identify low-income neighborhoods and educate customers on conservation opportunities through energy audits, bill inserts, presentations, and other measures.

Since 2015, all of the electric FEECA utilities have submitted programs in their DSM plans tailored to offer assistance to qualifying customers. Each FEECA utility’s conservation efforts with respect to low-income customers during 2024 are discussed below.

FPL

Through its Low Income Weatherization program, FPL leverages its partnerships with Weatherization Assistance Providers throughout its territory to offer these providers rebates for installation of program measures in qualifying homes.⁴¹ In 2024, FPL enrolled 18,681 customers in its Low-Income Weatherization program, which was 7,427 more customers were enrolled than in 2023. In part, these additional enrollments were facilitated because FPL’s fulfillment contractor added more resources focused on canvassing and targeting low-income areas within its service territory. The expanded efforts involved educating residents about the program, as well as directly installing measures into homes.

Additionally, FPL coordinated its outreach efforts in 2024 with other low-income assistance agencies to attend additional community events. Such events served as a platform for program enrollments for various energy saving programs, including Energy Surveys (audits) or the Community Energy Saver program.

DEF

In 2024, DEF continued its efforts to expand offering its Neighborhood Energy Saver (NES) program, a program that serves all customers, including low income customers. By identifying

³⁹The 2014 DSM Goals Order references electric utilities only.

⁴⁰Order No. PSC-14-0696-FOF-EU, issued December 16, 2014, in Docket Nos. 20130199-EI through 20130205-EI, *In re: Commission review of numeric conservation goals*.

⁴¹The Weatherization Assistance Program offered by FPL and other investor-owned electric utilities in Florida is a United States Department of Energy program that is administered at the state and local levels. Resource links are provided at this website: <https://www.energy.gov/scep/wap/how-apply-weatherization-assistance>

targeted demographic areas within a 15-mile radius, the utility was able to facilitate easier scheduling of appointments for customers and minimize travel times for its vendor. These efforts resulted in 5,821 program enrollments in 2024, which was very similar to number of enrollments from 2023 (5,846), yet well above the results from 2022, when 4,771 customers were enrolled.

Also in 2024, DEF expanded its efforts to offer its Low-Income Neighborhood Weatherization Assistance Program (LIWAP). For example, through a webinar series was co-sponsored by the Duke Foundation and the Florida Housing Coalition, DEF shared information about its LIWAP program. The five-part webinar series was offered to State Housing Assistance program administrators from various agencies throughout its service territory. In 2024, a total of 317 program enrollments were recorded, up from 184 in 2023. The Mid-Florida Community Services agency was involved in 124 (of the 317) program enrollments, which was the most enrollments among 7 other participating agencies.

TECO

TECO's Neighborhood Weatherization program features the installation of an energy efficiency kit that includes 12 energy savings measures, plus ceiling insulation and/or duct sealing, depending on the needs of the home. The utility uses Florida Census Tract Data to determine eligibility for this program and estimates that about 17 percent of its customers fall into the category of low-income or vulnerable status. In 2024, a total of 6,634 customers enrolled in Enrollment for this program was lower in 2024 compared to 2023 (8,258) due two unforeseen circumstances. First, a ransomware attack on the utility's internal processing system impaired enrollment for a period of time in the fourth quarter of 2024. Second, TECO suspended offering this program during its post-hurricane response to Hurricanes Debbie, Helene, and Milton in 2024. Both of these factors also impaired TECO in its efforts to offer its Energy and Renewable Education, Awareness and Agency Outreach program in 2024, which serves all customers, including low-income customers.

FPUC

Although FPUC does not offer a low income program, the company's Residential Energy Survey program serves all customers, including low-income customers. The utility's website, customer contact centers, billboards, and other forms of advertising in its service territories promote the Residential Energy Survey program, which in turn, provides information on other DSM programs that are available to all customers, including low-income customers. In 2025, FPUC plans to relaunch its Residential Energy Survey program under a new brand – Efficiency First – with a completely redesigned structure built on educational engagement, incentives, and a streamlined digital infrastructure.

JEA

JEA's Neighborhood Energy Efficiency Program includes free installation of conservation products and provides energy education packets that give income-qualified customers energy-saving ideas and information about JEA's other DSM programs. JEA also promotes the availability of nonprofit community-based utility bill assistance programs, including its Neighbor to Neighbor donation program. These programs are found on the JEA website and amplified through social media and direct email promotions.

In 2024, JEA continued its partnership with multiple government and non-profit agencies that provide direct and indirect financial assistance to customers in its service territory. In addition, JEA developed and presented conservation based educational resources designed to help homeowners understand the biggest users of energy and water inside and outside the home.

OUC

In 2024, OUC continued its Project Care and Efficiency Delivered programs to assist low-income customers in conserving energy and demand. Project Care assists customers in paying their energy bills and implementing energy efficiency measures. In this program, OUC supplements donations it receives, and applies such donations to the customers' utility bill. In the income-based Efficiency Delivered program, OUC pays for 85 percent of the costs for energy and water efficiency upgrades, up to a cap of \$2,500 per installation. Income qualified participants pay the remaining 15 percent over the first 24 months, interest free.

3.4 Investor-Owned Utility Research and Development Programs

In addition to specific DSM programs that provide measurable demand and energy savings, the four electric IOUs conduct conservation research and development initiatives to evaluate emerging DSM opportunities. In these programs, Florida's electric IOUs often partner with universities or established industry research organizations. With the arrival of new electricity-consuming products and new technologies, research and development by Florida's electric IOUs creates opportunities to identify emergent options to conserve electricity. The recent initiatives undertaken by the electric IOUs are discussed below.

FPL

In 2024, FPL's research and development program focused on four key projects: the Smart Panel Pilot, a retro-commissioning study, a low-income deep retrofit initiative, and a new electric vehicle (EV) charging pilot. The Smart Panel Pilot continued to evaluate the capabilities of smart panels in enhancing residential energy efficiency and demand response. As of December 2024, 100 smart panels had been installed in customer homes, with the pilot scheduled to run through 2028. FPL also advanced its retro-commissioning study at a large, multi-building church campus. In 2024, energy efficiency recommendations were finalized, and FPL is collaborating with the church to implement these measures. Post-implementation, FPL will monitor the installed measures over a 12-month period to evaluate their energy efficiency impact. The low-income deep retrofit pilot in the Pensacola area continued data collection in 2024. This pilot assesses the impact of comprehensive energy efficiency measures (including heat pumps, heat pump water heaters, duct sealing/repair, ceiling insulation, and smart thermostats) installed in the spring of 2023. Preliminary analyses indicated average annual energy consumption savings of 32% among participating homes.

FPL also engaged in a pilot project in 2024 to evaluate the use of vehicle telematics for managing EV charging. The six-month study enrolled employees utilizing FPL's charging facilities at the Juno Beach offices. Data collected aimed to understand charging habits and assess the ability of vehicle telematics to manage charging sessions, thereby smoothing EV charging demand. The pilot concluded in December 2024, with data evaluation ongoing.

Additionally, FPL maintained its collaborations with the Florida Solar Energy Center (FSEC), various Florida universities, the Electric Power Research Institute (EPRI), and E-Source research initiatives.

DEF

In 2024, DEF continued ongoing research evaluating the energy efficiency and demand response potential of an advanced commercial air conditioning technology. This initiative is studying a cooling system that combines dew-point-style sensible cooling with liquid desiccant dehumidification, allowing for energy storage and reduced peak power consumption. DEF is piloting this technology at two volunteer customer sites to assess its performance.

DEF also continued its collaboration with the University of Central Florida (UCF) and University of South Florida (USF) for energy storage research. In 2024, DEF continued studying long-duration, customer-side energy storage systems at UCF. Those studies focused on battery performance during charging and discharging cycles, degradation over time, and the optimal operation of battery energy storage in distribution systems with high solar energy penetration.

At USF, DEF continued its study of customer-sited solar photovoltaic (PV) systems and energy storage at the University's 5th Avenue Garage Microgrid. The system provides load smoothing, islanding capabilities, and demand response. A publicly available dashboard offers live data and project-specific information for further study.

DEF continued its participation in the Electric Power Research Institute's (EPRI) Solar Distributed Photovoltaic (DPV) project, which is focusing on data collection to document customer solar resources, particularly larger PV arrays with and without energy storage. In 2024, DEF also continued its work in the Vehicle-to-Grid (V2G) study involving the Ford F-150 Lightning electric pickup truck. The pilot includes lab testing and real-world application in four employee-volunteer homes, examining the truck's capabilities for demand response, vehicle-to-home backup power, and EV charging control. This initiative aims to assess the potential of EVs as grid resources.

In May 2024, DEF completed its Smart Home Gateway pilot that studied home energy management devices. The study evaluated the capabilities of control devices to perform on-site operations, such as receiving data from a customer's AMI meter, allowing automatic control of devices according to a customer's preference, and enabling open-source, utility-demand responses. The findings from this study will be used in future energy efficiency and demand response programs.

TECO

In 2024, TECO concluded the Integrated Renewable Energy System ("IRES") Pilot Program, which was commissioned in 2021. The system included a solar carport array, battery storage, EV chargers, and industrial truck charging stations. The program's objectives were to evaluate DSM benefits, determine ideal system operations for commercial users, and educate customers on integrated system capabilities. A final report summarizing findings was completed in 2024.

Additionally, TECO resumed its commercial battery storage research project, originally begun in 2016 in partnership with the University of South Florida. Installations were completed in 2024 for further study at two pilot sites: a nonprofit vocational training center and a community facility. Both systems were designed for peak shaving and included lithium iron phosphate batteries. Lessons learned from site planning, storm response, and energy performance are expected to support future DSM planning.

FPUC

In 2024, FPUC suspended the Powerhouse project within its Conservation Demonstration and Development (“CDD”) program. The project faced unresolved technical complications related to installation logistics between the equipment provider and the participating customer, and no data was collected prior to equipment removal. Other than Powerhouse, no other CDD activities were performed in 2024, and has since shifted its CDD efforts to focus on residential applications in the 2025–2029 planning period.

Section 4. Conservation Cost Recovery

Florida's IOUs are allowed to recover reasonable expenses for Commission-approved DSM programs through cost recovery clauses. For electric IOUs, the recovery mechanism is the ECCR clause. For natural gas LDCs, the recovery mechanism is the NGCCR clause. These costs include utility expenses such as administrative costs, equipment, and incentive payments to customers. Before requesting recovery of costs through the ECCR clause, an electric IOU must provide data on DSM program cost-effectiveness. The Commission conducts a financial audit each year prior to approving cost recovery of these expenses.

4.1 Electric IOU Cost Recovery

Since 2015, annual electric utility expenditures to fund conservation programs has varied over a rolling ten-year period, due to additions and modifications of these voluntary programs. In addition, these utilities have reported that 2020 and 2021 COVID-related impacts have resulted in lower levels of customer participation in DSM programs, contributing to the decline in DSM expenditures in those years. Table 11 shows the annual DSM expenditures recovered by Florida's IOUs from 2015-2024.

Table 11
DSM Expenditures Recovered by IOUs (2015-2024)

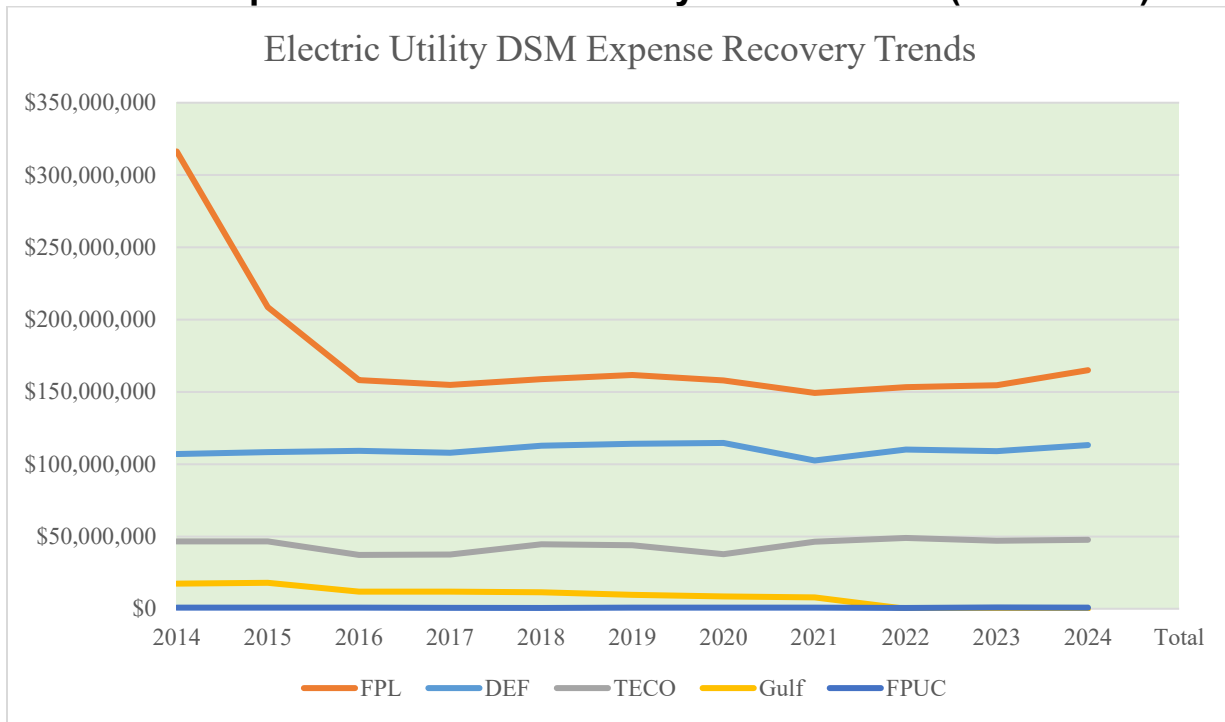
	FPL	DEF	TECO	Gulf	FPUC	Total
2015	\$208,643,788	\$108,455,141	\$46,516,401	\$17,961,885	\$718,616	\$382,295,831
2016	\$158,174,787	\$109,155,438	\$37,242,148	\$11,915,459	\$687,590	\$317,175,422
2017	\$154,916,595	\$107,890,962	\$37,585,598	\$11,854,558	\$640,996	\$312,888,709
2018	\$158,735,829	\$112,863,333	\$44,558,717	\$11,399,250	\$656,154	\$328,213,283
2019	\$161,738,898	\$114,084,224	\$43,988,528	\$9,607,262	\$865,843	\$330,284,755
2020	\$157,892,907	\$114,692,900	\$37,850,526	\$8,637,394	\$782,143	\$319,855,870
2021	\$149,275,934	\$102,542,901	\$46,328,538	\$7,852,934	\$751,683	\$306,751,990
2022	\$153,282,683	\$110,172,154	\$48,985,457	*	\$668,543	\$313,108,837
2023	\$154,681,984	\$109,076,687	\$47,028,255	*	\$919,544	\$311,706,470
2024	\$165,109,197	\$113,135,520	\$47,729,098	*	\$811,045	\$326,784,860
Total						\$3,737,216,266

Source: Docket Nos. 20160002-EG through 20250002-EG, Schedules CT-2 from the IOUs' May testimonies.

*Effective January 1, 2022, FPL and Gulf Power Company (Gulf) operationally merged.

Figure 4 shows the data featured in Table 11 in a line graph.⁴²

Figure 4
DSM Expenditures Recovered by Electric IOUs (2015-2024)



Source: Docket Nos. 20160002-EG through 20250002-EG, Schedules CT-2 from the IOUs' May testimony.

During the annual ECCR clause proceedings, the Commission approves the ECCR factors, by customer class, which each utility will apply to the energy and demand portions of customer bills. These factors are set using each IOU's estimated conservation costs for the next year and reconciliation for any actual conservation cost over- or under-recovery amounts associated with the current and prior years.

In November 2025, the Commission set the ECCR factors for the period January through December 2026. Table 12 illustrates the approved ECCR factors and the monthly bill impact for a residential customer. For illustrative purposes, these factors are applied to a monthly residential bill based on 1,000 kilowatt-hours (kWh) per month energy usage.

⁴²Because Figure 4 incorporates the dollar amounts for DSM expenditures between the largest (FPL) and smallest (FPUC) investor-owned electric utilities, the scale for the Y-axis (dollars) must accommodate very small and very large data points. As such, the data points in the line graph for FPUC appears as near zero values, although the actual values range between \$640,000 and \$920,000.

Table 12
Residential Energy Conservation Cost Recovery Factors (2026)

Utility*	ECCR Factor (Cents per kWh)	Monthly Bill Impact (Based on usage of 1,000 kWh per month)
FPL (If Rate Case proposal is approved) ⁴³	0.148	\$1.48
FPL (If Rate Case proposal is not approved)	0.139	\$1.39
DEF	0.386	\$3.86
TECO	0.270	\$2.70
FPUC	0.321	\$3.21

Source: Order No. PSC-2025-XXXX-FOF-EG, Docket No. 20250002-EG.

*While JEA and OUC fall under the FEECA Statute, the Commission does not regulate electric rates for municipal utilities.

4.2 Natural Gas Cost Recovery

Commission Rule 25-17.015, F.A.C., establishes a mechanism for recovery of reasonable costs attributed to natural gas conservation programs. While Peoples Gas System (PGS) is the only natural gas utility subject to FEECA, the other LDCs [Florida City Gas (FCG), Florida Public Utilities Company (FPUC), St. Joe Natural Gas Company (SJNG), and Sebring Gas System (SGS)] covered in this section offer Commission-approved DSM programs without a specific therm savings goal. As it does for the electric IOUs, the Commission also conducts financial audits of the LDCs' conservation expenditures on a yearly basis and adjusts the LDCs' cost recovery factors to allow for recovery of actual and projected program-related costs. Table 13 shows the amounts each LDC recovered in natural gas conservation program expenditures from 2015-2024.

⁴³ In Docket No. 20250011-EI, Petition by Florida Power & Light Company for Base Rate Increase, a pending proposal will affect the allocation of energy conservation cost recovery clause costs, which will, in turn, impact the residential factor that FPL will apply to customer bills in the January through December 2026 period. Due to the timing of the Commission's consideration of FPL's proposal in Docket No. 20250011-EI, this pre-publication version of Table 12 shows information for the Commission's acceptance of FPL's proposal and for the alternative. The published version of Table 12 include a single line entry that reflects the Commission's decision on this matter.

Table 13
DSM Expenditures Recovered by LDCs (2015-2024)

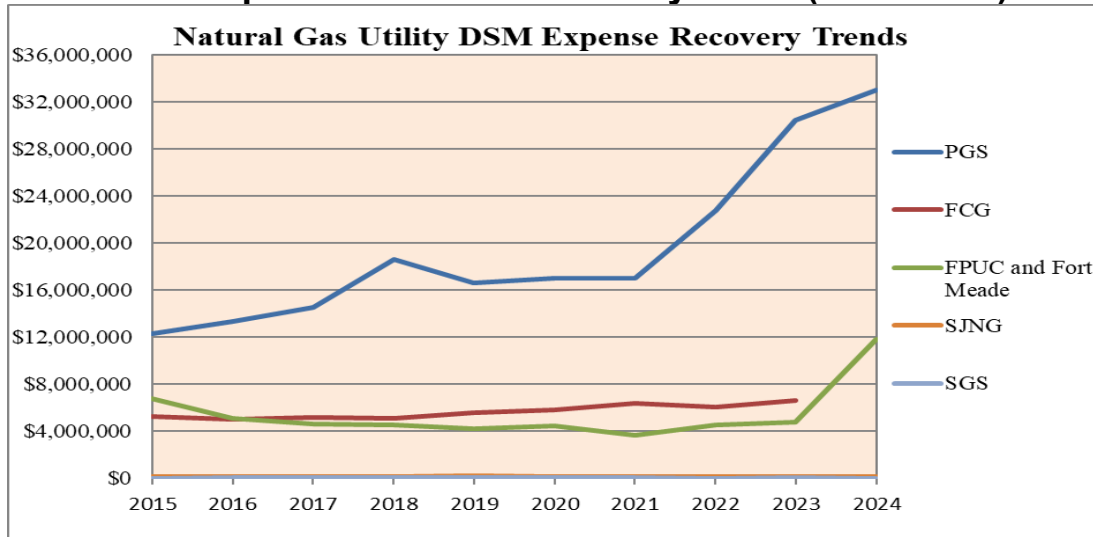
	PGS	FCG	FPUC Consolidated Companies	SJNG	SGS	Total
2015	\$12,335,245	\$5,240,383	\$6,768,175	\$123,400	\$33,563	\$24,500,766
2016	\$13,345,716	\$5,037,863	\$5,098,245	\$156,250	\$36,801	\$23,674,875
2017	\$14,543,555	\$5,149,573	\$4,617,501	\$144,900	\$42,237	\$24,497,766
2018	\$18,605,532	\$5,067,917	\$4,562,021	\$190,625	\$47,126	\$28,473,221
2019	\$16,619,336	\$5,564,237	\$4,252,769	\$231,600	\$46,184	\$26,714,126
2020	\$17,031,280	\$5,824,651	\$4,447,010	\$189,625	\$52,162	\$27,544,728
2021	\$16,999,771	\$6,421,893	\$3,653,829	\$179,450	\$40,411	\$27,295,354
2022	\$22,801,408	\$6,070,844	\$4,573,742	\$173,225	\$30,841	\$33,650,060
2023	\$30,425,021	\$6,649,986	\$4,796,193	\$181,225	\$45,846	\$42,098,271
2024	\$33,000,351	*	\$11,821,867	\$143,000	\$33,664	\$44,998,882
Total						\$303,448,049

Source: Docket Nos. 20160004-EG through 20250004-EG, Schedules CT-2 from the LDCs' May testimony.

*Effective January 1, 2024, the costs for FPUC and FCG were consolidated.

Figure 5 shows the data featured in Table 13 in a line graph.⁴⁴

Figure 5
DSM Expenditures Recovered by LDCs (2015-2024)



Source: Docket Nos. 20150004-EG through 20250004-EG, Schedules CT-2 from the LDCs' May testimony.

*Note that since 2014, DSM expenditures for CUC and IGC were consolidated with FPUC-Fort Meade, and reported as FPUC Consolidated Companies.

⁴⁴Because Figure 5 incorporates the dollar amounts for DSM expenditures between the largest (PGS) and smallest (SGS) investor-owned natural gas utilities, the scale for the Y-axis (dollars) must accommodate very small and very large data points. As such, the data points in the line graph for SGS and SJNG appear as near zero values, although the actual values range between \$30,000 and \$58,000 for SGS and \$123,000 and \$231,000 for SJNG. The upward-sloping trend line shown for PGS since 2021 was due to incentive payments primarily attributable to new construction activity in its service territory.

In November 2025, the Commission set the natural gas LDC conservation cost recovery factors for the 2026 billing cycle. Table 14 provides the LDCs’ residential cost recovery factors for 2026 and the impact on a residential customer bill using 20 therms of natural gas per month.

Table 14
Residential Natural Gas Conservation Cost Recovery Factors (2026)

Utility	Cost Recovery Factor (Cents per Therm)	Monthly Bill Impact (Based on usage of 20 Therms per month)
PGS	8.184	\$1.64
FPUC	26.994	\$5.40
FCG	27.092	\$5.42
SJNG	19.986	\$4.00
SGS	15.845	\$3.17

Source: Order No. **PSC-2025-XXXX-FOF-GU**, Docket No. 20250004-GU.

Section 5. Educating Florida’s Consumers on Conservation

5.1 Commission Consumer Education Outreach

While the Commission has statutory authority to require conservation efforts by regulated utilities, as part of the agency’s outreach program, the Commission complements utility efforts with its own conservation-related activities. To effectively reach as many consumers as possible, the Commission’s consumer education program uses a variety of platforms to share conservation information, including the Commission website, public events, brochures, press releases and articles, E-Newsletters, YouTube, LinkedIn, and X. Most of the data in this section covers October 2024 through August 2025.

Conservation information is also available through other governmental and utility websites. Section 5.2 lists related websites for state and federal agencies, investor-owned electric utilities, and local gas distribution companies to further assist consumers.

National Consumer Protection Week

National Consumer Protection Week (NCPW), March 2-8, 2025, highlights consumer protection and education. T

For NCPW 2025, the Commission presented information in Hillsborough, Pinellas, and Leon Counties, showing consumers how to save money through conservation and avoid utility-related scams. A virtual event was also held with a senior organization in Broward County. For more than a decade, the FPSC has joined government agencies, advocacy organizations, and private sector groups nationwide to highlight NCPW.

Older Americans Month

Each May, the Commission participates in Older Americans Month, a national initiative honoring older Americans’ contributions to families, communities, and society. The 2025 theme was “*Flip the Script on Aging.*” The FPSC partnered with community centers in Holmes, Washington, Madison, Volusia, and Duval Counties to meet with older Florida residents in person and discuss Commission resources. A virtual meeting was also held with a senior organization in Monroe County.

Library Outreach Campaign

Each August, the Commission provides educational packets, including FPSC conservation materials, to Florida public libraries across the state for consumer distribution. In 2025, the Commission’s Library Outreach Campaign reached 570 state public libraries and branches. Following the campaign, many libraries request FPSC brochures throughout the year.

Energy Awareness Month

Each October, the U.S. Department of Energy sponsors National Energy Awareness Month to promote smart energy choices and highlight economic and job growth, environmental protection, and increased energy independence. In 2024, the FPSC shared weekly conservation tips on X (@floridapsc) during the month, including its Conservation House, Conserve Your World and related outreach information with energy saving tips for consumers.

Community Events

The FPSC is active in communities around the state, presenting energy conservation information to students, older adults, and low-income residents at local centers. The Commission also provides conservation resources with county and city businesses at meetings and other events. Through ongoing partnerships with governmental entities, consumer groups, and many other service organizations, the Commission regularly distributes energy and water conservation materials.

The FPSC also seeks new opportunities to share conservation information. At least one virtual and two public events are scheduled monthly.

In-person events (Oct. 2024-Aug.20025) included:

- Bradfordville Community Center Lunch and Learn
- The Rock Transformation Center
- The Friends of AARP
- Jacksonville Senior Expo, November 2024 and May 2025
- Wakulla Information Fair
- Ft. Braden Community Center
- Woodville Community Center
- North County Senior Center
- Mid County Senior Center
- West County Senior Center
- L. Claudia Senior Center
- Renaissance Senior Center at South Econ Park
- Brandon Senior Center
- Lutz Senior Center
- Town N' Country Senior Center
- The Sunshine Center
- Miccosukee Community Center
- Advent Christian Village
- Enoch Davis Center
- Crystal Lakes Manor Clubhouse
- Senior Citizens Council of Madison County, Inc.
- Holmes County Council on Aging Senior Expo
- Ormond Beach Senior Center
- Daytona Beach Center, John H. Dickerson Center Campus
- The Deltona Center
- Ft. Braden Community Center
- Bay County Council on Aging
- Wakulla Senior Citizens Council, Inc.
- Disability and Adaptive Recreation Expo
- Florida Kids and Family Expo
- North Brevard Senior Center

- Martin Andersen Senior Center
- Jacksonville Senior Expo
- Marion Café
- Marion Oaks
- Mid-Florida Community Services, Inc.
- Southside Umatilla Community Center
- Mid-Florida Community Services, Inc. at South Lake Presbyterian Church
- James L. Wyche Senior Center
- Florida Kids and Family Expo

Virtual meetings (Oct. 2024-Aug. 2025) included:

- Osceola County State Housing Initiatives Partnership Program
- Wakulla County Housing Authority
- Suwannee River Economic Council, Inc.
- Florida Impact, Inc.
- Broward County State Housing Initiative Partnership Program
- Monroe County Social Services
- City of Jacksonville Parks, Recreation and Community Services

Service Hearings and Customer Meetings

As an ongoing outreach initiative, the Commission supplies conservation brochures to customers at FPSC service hearings and customer meetings across the state. In 2025, several in-person service hearings were held for customers of two investor-owned electric utilities—including Florida’s largest IOU—as well as a large natural gas IOU and a wastewater certification case. For the convenience of utility customers, the FPSC also offers virtual service hearings and customer meetings. In addition to FPSC conservation information, both virtual and in-person participating customers receive a Rate Case Overview that explains the utility’s rate change request and includes FPSC website links to consumer information.

Website Outreach Resources

The FPSC website offers a wide assortment of free brochures, publications, and other resources to help consumers save energy. Conservation brochures may be viewed and printed directly from the website, [FloridaPSC.com/publications](https://www.floridapsc.com/publications), [ordered online](#), or requested by mail or phone.

During the reporting period, the Commission received over 52,000 publication requests, and its Consumer Assistance pages were viewed more than 87,450 times (Google Analytics).

Newsletters

The Commission’s quarterly [Consumer Connection Newsletter \(CCN\)](#) features current energy and water conservation topics, consumer tips, and general Commission information. Conservation-related information highlighted through video and text during the reporting period included: *PSC Kids Deliver Powerful Message on Conservation*, *Chairman Mike La Rosa Delivers Keynote Address at PURC*, *America’s Power Interviews Commissioner Art Graham*, and *You Have a Voice in Your Utility Rates*. The CCN is available under Consumer Assistance

on the Commission's homepage and distributed to consumers via social media or by subscribing to the free newsletter online.

Media Outreach

News releases on major Commission decisions, meetings, and public events are posted to the website and distributed via email and X. The FPSC also issued news releases and posts videos on social media, urging energy and water conservation during annual outreach programs such as Energy Awareness Month and NCPW. Water conservation was highlighted in March with a release on Fix a Leak Week, sponsored by the Environmental Protection Agency, and in May for National Drinking Water Week, sponsored by the American Water Works Association. FPSC articles on conservation are also featured in Aging Outlook, the biannual digital newspaper from the Florida Department of Elder Affairs.

Youth Education

The FPSC supports conservation awareness among young consumers through its student guide Get Wise and Conserve Florida! The guide combines games and puzzles with lessons on energy and water efficiency. During the reporting period, the resource guide took center stage at the 10th Annual Florida Kids and Family Expo in Orlando, with more than 10,000 attending and visiting the FPSC's booth. The booklet is also promoted to all public libraries through the Library Outreach Campaign and is provided at all Commission outreach events, where it continues to be a favorite.

For Take Your Child to Work Day in April, FPSC activities focused on energy conservation, water protection, and sustainability. Children demonstrated their newly learned conservation strategies in a public service announcement poster, which was shared on social media and in the Consumer Connection Newsletter.

5.2 Related Websites

State Agencies and Organizations

Florida Public Service Commission – <http://www.floridapsc.com/>

Florida Department of Environmental Protection – <https://floridadep.gov/>

The Office of Energy – <https://www.fdacs.gov/Divisions-Offices/Energy>

Florida Solar Energy Center – <https://energyresearch.ucf.edu/>

Florida Weatherization Assistance – <https://www.benefits.gov/benefit/1847>

Florida's Local Weatherization Agencies List - <https://floridajobs.org/community-planning-and-development/community-services/weatherization-assistance-program>

U.S. Agencies and National Organizations

U.S. ENERGY STAR Program – <https://www.energystar.gov/>

U.S. Department of Energy – Energy Efficiency and Renewable Energy Information <http://www.eere.energy.gov/>

National Energy Foundation – <https://nefl.org/>

Florida's Utilities Subject to FEECA

Florida Power & Light Company – <http://www.fpl.com/>

Duke Energy Florida, LLC – <http://www.duke-energy.com/>

Tampa Electric Company – <http://www.tampaelectric.com/>

Florida Public Utilities Company – <http://www.fpuc.com/>

JEA – <http://www.jea.com/>

Orlando Utilities Commission – <http://www.ouc.com/>

Peoples Gas System – <http://www.peoplesgas.com/>

Florida's Investor-Owned Natural Gas Utilities

Florida City Gas – <http://www.floridacitygas.com/>

Florida Division of Chesapeake Utilities – <http://www.chpk.com/companies/chesapeake-utilities/>

Florida Public Utilities Company – <http://www.fpuc.com/>

Florida Public Utilities Company – Ft. Meade Div. – <http://www.fpuc.com/>

Florida Public Utilities Company – Indiantown Div. – <http://www.fpuc.com/>

Peoples Gas System – <http://www.peoplesgas.com/>

Sebring Gas System – <http://www.sebringgas.com/>

St. Joe Natural Gas Company – <http://www.stjoenaturalgas.com/>

Appendix A. 2024 FEECA Utility Conservation Programs

Electric IOUs

Florida Power & Light Company	
Residential Programs	Residential Home Energy Survey Residential Load Management (On Call®) Residential Air Conditioning Residential New Construction (BuildSmart®) Residential Ceiling Insulation Residential Low-Income Weatherization
Commercial/Industrial Programs	Business Energy Evaluation (BEE) Business On Call® Commercial/Industrial Demand Reduction (CDR) Commercial/Industrial Load Control (CILC) Business Heating, Ventilating, and Air Conditioning (HVAC) Business Lighting Business Custom Incentive (BCI) Curtable Load
Other	Conservation Research and Development (CRD) Cogeneration & Small Power Production

Duke Energy Florida, LLC	
Residential Programs	Home Energy Check Residential Incentive Neighborhood Energy Saver Low-Income Weatherization Assistance Residential Load Management
Commercial/Industrial Programs	Business Energy Check Smart Saver Business (f/k/a Better Business) Commercial Energy Management Smart Saver Custom Incentive Interruptible Service Curtable Service Standby Generation
Other	Technology Development Qualifying Facilities

Tampa Electric Company	
Residential Programs	Residential Energy Audits (4 Programs) Residential Ceiling Insulation Residential Duct Repair Energy Education, Awareness, and Agency Outreach ENERGY STAR for New Multi-Family ENERGY STAR for New Homes ENERGY STAR Pool Pumps ENERGY STAR Thermostats Residential Heating and Cooling Neighborhood Weatherization (Low-Income) Residential Price Responsive Load Management (Energy Planner) Residential Prime Time Plus (Residential Load Management) Residential Window Replacement
Commercial/Industrial Programs	Commercial/Industrial Energy Audits (2 Programs) Commercial Chiller Cogeneration Conservation Value Commercial Cooling Demand Response Facility Energy Management System Industrial Load Management (GSLM 2&3) Street and Outdoor Lighting Conversion Lighting Conditioned Space Lighting Non-Conditioned Space Lighting Occupancy Sensors Commercial Load Management (GSLM 1) Commercial Smart Thermostats Standby Generator Variable Frequency Drive for Compressors Commercial Water Heating
Other	Conservation Research and Development Integrated Renewable Energy System Renewable Energy

Florida Public Utilities Company	
Residential Programs	Residential Energy Survey Residential Heating and Cooling Efficiency Upgrade
Commercial/Industrial Programs	Commercial Energy Consultation Commercial Heating and Cooling Efficiency Upgrade Commercial Chiller Upgrade Commercial Reflective Roof
Other	Conservation Demonstration and Development Low-Income Energy Outreach

Electric Municipal Utilities

JEA	
Residential Programs	Residential Energy Audit Residential Solar Water Heating Neighborhood Efficiency (Low-Income) Residential Efficiency Upgrade Energy Efficient Products MyWay Prepaid Program
Commercial/Industrial Programs	Commercial Energy Audit Commercial Prescriptive Lighting Program Commercial Prescriptive Small Business Direct Install Custom Commercial

Orlando Utilities Commission	
Residential Programs	Home Energy Survey Duct Repair Rebate Ceiling Insulation Rebate High-Performance Windows Rebate Efficient Electric Heat Pump Rebate New Home Rebate Heat Pump Water Heater Rebate Efficiency Delivered (Low-Income)
Commercial/Industrial Programs	Energy Audit Efficient Electric Heat Pump Rebate Duct Repair Rebate Ceiling Insulation Rebate Cool/Reflective Roof Rebate Indoor Lighting Billed Solution Indoor Lighting Rebate Custom Incentive

Natural Gas LDC

Peoples Gas System	
Residential Programs	Residential Customer Assisted Energy Audit Residential New Construction Residential Retrofit Residential Retention
Commercial/Industrial Programs	Commercial Walk-Through Energy Audit Commercial New Construction Commercial Retrofit Commercial Retrofit Combined Heat & Power Commercial Retrofit Electric Replacement Commercial Retention
Other	Conservation Research and Development

Appendix B. 2024 FEECA Utility Conservation Program Descriptions

Electric FEECA IOUs

A. Florida Power & Light Company

Residential Programs

- **Residential Home Energy Survey**
The Residential Home Energy Survey Program educates customers on energy efficiency and encourages implementation of recommended energy efficiency measures, even if they are not included in FPL's DSM programs. The Residential Home Energy Survey Program is also used to identify potential candidates for other FPL DSM programs. FPL offers in-home, phone-assisted, and online audits for its residential customers.
- **Residential Load Management (On Call)**
The Residential Load Management Program allows FPL to turn off certain customer-selected appliances using FPL-installed equipment during periods of extreme demand, capacity shortages, or system emergencies.
- **Residential Air Conditioning**
The Residential Air Conditioning Program encourages customers to install high-efficiency central air conditioning systems.
- **Residential New Construction (BuildSmart®)**
The Residential New Construction Program encourages builders and developers to design and construct new homes that achieve BuildSmart® certification and move towards ENERGY STAR® qualifications.
- **Residential Ceiling Insulation**
The Residential Ceiling Insulation Program encourages customers to improve their homes' thermal efficiency.
- **Residential Low-Income Weatherization**
The Residential Low-Income Weatherization Program assists low-income customers through state Weatherization Assistance Provider (WAP) agencies and FPL-conducted Energy Retrofits.

Commercial/Industrial Programs

- **Business Energy Evaluation (BEE)**

The Business Energy Evaluation Program educates customers on energy efficiency and encourages implementation of recommended practices and measures, even if these are not included in FPL's DSM programs. The Business Energy Evaluation is also used to identify potential candidates for other FPL DSM programs. FPL offers the Business Energy Evaluation in on-site or online formats.

- **Business On Call®**

The Business On Call® Program allows FPL to turn off customers' direct expansion central air-conditioning units using FPL-installed equipment during periods of extreme demand, capacity shortages, or system emergencies.

- **Commercial/Industrial Demand Reduction (CDR)**

The Commercial/Industrial Demand Reduction Program allows FPL to control customer loads of 200 kW or greater during periods of extreme demand, capacity shortages, or system emergencies. FPL installs a load management device at the customer's facility and provides monthly credits to customers. Unlike the CILC program, the CDR program is still open to new customers.

- **Commercial/Industrial Load Control (CILC)**

The Commercial/Industrial Load Control Program allows FPL to control customer loads of 200 kW or greater during periods of extreme demand, capacity shortages, or system emergencies. The CILC Program was closed to new participants as of 2000, but is available for existing participants who entered into a CILC agreement as of March 1996.

- **Business Heating, Ventilating, and Air Conditioning (HVAC)**

The Business HVAC Program encourages customers to install high-efficiency HVAC systems.

- **Business Lighting**

The Business Lighting Program encourages customers to install high-efficiency lighting systems.

- **Business Custom Incentive (BCI)**

The Business Custom Incentive Program encourages customers to install unique high-efficiency technologies not covered by other FPL DSM programs.

- **Curtable Load**

The Curtable Load program provides qualifying customers capacity payments for electric load which could be curtailed during certain conditions. This program was closed for new enrollment as of January 1, 2022.

Other Programs

- **Conservation Research and Development (CRD) Project**
This project consists of research studies designed to: identify new energy efficient technologies; evaluate and quantify their impacts on energy, demand, and customers; and where appropriate and cost-effective, incorporate an emerging technology into a DSM program.
- **Cogeneration & Small Power Production**
The Cogeneration and Small Power Production Program facilitates the interconnection and administration of contracts for cogenerators and small power producers.

B. Duke Energy Florida, LLC

Residential Programs

- **Home Energy Check**
The Home Energy Check is a residential energy audit program that provides residential customers with an analysis of their energy consumption and educational information on how to reduce energy usage and save money. The Home Energy Check Program is the foundation for other residential demand-side management programs and offers walkthrough, online, phone-assisted, and Home Energy Rating audits for its residential customers. Participants in the program may receive a residential Energy Efficiency Kit that contains energy-saving measures that can be easily installed and utilized by the customer.
- **Residential Incentive**
The Residential Incentive Program provides incentives to residential customers for energy efficiency improvements in both existing and new homes. This includes incentives for measures such as duct testing, duct repair, attic insulation, replacement of windows, high-efficiency heat pump replacing resistance heat, high-efficiency heat pump replacing a heat pump, and newly constructed Energy Star homes.
- **Neighborhood Energy Saver**
The Neighborhood Energy Saver Program installs energy conservation measures, identified through an energy assessment, in the homes of customers in selected neighborhoods where at least 50 percent of households have incomes equal to or less than 200 percent of the poverty level established by the U.S. government.
- **Low-Income Weatherization Assistance Program**
The Low-Income Weatherization Assistance Program works with the Florida Department of Economic Opportunity and local weatherization providers to deliver energy education, efficiency measures, and incentives to weatherize the homes of income-eligible families. DEF assists by providing energy education materials and financial incentives to weatherize the homes of low-income families.

- **Residential Load Management**

The Residential Load Management Program is a voluntary program that uses direct control of customer equipment to reduce system demand during winter and summer peak capacity periods by controlling service to select customer appliances.

Commercial/Industrial Programs

- **Business Energy Check**

The Business Energy Check Program is a commercial energy audit program that provides commercial customers with an analysis of their energy usage and information about energy-saving practices and cost-effective measures that they can implement at their facilities.

- **Smart Saver Business (f/k/a Better Business)**

Smart Saver Business is an umbrella efficiency program that provides incentives to existing C/I and government customers for HVAC, ceiling and roof insulation upgrades, duct leakage and repair, demand-control ventilation, and cool roof coating.

- **Commercial Energy Management**

The Commercial Energy Management Program uses direct control of customer equipment to reduce system demand during winter and summer peak capacity periods. The Commercial Energy Management Program was closed to new participants in 2000, but is still open for existing participants.

- **Smart Saver Custom Incentive**

The Smart Saver Custom Incentive Program is designed to encourage C/I customers to make capital investments for energy-efficiency measures which reduce peak demand and provide energy savings. This program provides incentives for projects which are cost-effective but not otherwise addressed through DEF's incentive programs.

- **Interruptible Service**

Interruptible Service is a direct load control program that allows DEF to reduce system demand by interrupting electrical service during times of capacity shortage during peak or emergency conditions. In return, customers receive a monthly bill credit.

- **Curtable Service**

Curtable Service is an indirect load control program that reduces system demand through customer contracts to curtail all or a portion of their electricity demand at times of capacity shortage during peak or emergency conditions. In contrast to the Interruptible Service Program, the customer is able to control whether their appliances are turned off during times of stress on the grid. In return, customers receive a monthly bill credit.

- **Standby Generation**

The Standby Generation Program is a demand control program that allows DEF to reduce system demand by dispatching the customer's standby generator. This is a voluntary program available to C/I customers who have on-site generation capability and are willing to reduce demand on DEF's system when requested for system reliability purposes.

Other Programs

- **Technology Development**

The Technology Development Program allows DEF to investigate technologies that support the development of new demand response and energy-efficiency programs. DEF is investigating hardware and software to manage residential loads, the value of long-duration customer-side energy storage systems, precision temperature measurement and analysis, solar resources, and data and patterns related to charging electric vehicles.

- **Qualifying Facilities Program**

This program develops standard offer contracts, negotiates, enters into, amends and restructures nonfirm energy, and firm energy and capacity contracts entered into with qualifying cogeneration, small power producers, and renewable facilities.

C. Tampa Electric Company

Residential Programs

- **Residential Energy Audit Programs**

Tampa Electric offers four Residential Energy Audits Programs, including walk-through free energy audits, customer assisted energy audits, and also computer assisted audits.

- **Residential Ceiling Insulation**

The Residential Ceiling Insulation Program offers rebates to existing residential customers to install additional ceiling insulation in existing homes.

- **Residential Duct Repair**

The Residential Duct Repair Program encourages residential customers to repair leaky duct work of central air conditioning systems in existing homes.

- **Energy Education, Awareness, and Agency Outreach**

The Energy Education, Awareness, and Agency Outreach Program engages and educates groups of customers and students on energy efficiency in an organized setting. Also, participants receive an energy savings kit with energy saving devices and information.

- **ENERGY STAR for New Multi-Family Residences**

The ENERGY STAR for Multi-Family Residences Program utilizes a rebate to encourage construction of new multi-family residences that meet the requirements to achieve the ENERGY STAR certified apartments and condominiums label.

- **ENERGY STAR for New Homes**

The ENERGY STAR for New Homes Program incentivizes residential home builders to build homes that qualify for the ENERGY STAR award by achieving energy efficiency levels greater than current Florida building code baseline practices.

- **ENERGY STAR Pool Pumps**
The ENERGY STAR Pool Pumps Program offers customer rebates for installing high efficiency ENERGY STAR rated pool pumps to help reduce their energy consumption while reducing TECO's weather sensitive peak demand.
- **ENERGY STAR Thermostats**
The ENERGY STAR Thermostats Program offers customer rebates for installing an ENERGY STAR certified smart thermostat to help reduce their energy consumption while reducing TECO's weather sensitive peak demand.
- **Residential Heating and Cooling**
The Residential Heating and Cooling Program offers rebates to residential customers for installing high-efficiency heating and cooling equipment in existing homes.
- **Neighborhood Weatherization (Low-Income)**
The Neighborhood Weatherization Program provides for the installation of energy efficient measures for qualified low-income customers.
- **Residential Price Responsive Load Management (Energy Planner)**
The Residential Price Responsive Load Management (Energy Planner) Program reduces weather-sensitive loads through an innovative price responsive rate. The price responsive rate encourages residential customers to make behavioral or equipment usage changes by pre-programming HVAC, water heating, and pool pumps.
- **Residential Prime Time Plus (Residential Load Management)**
The Residential Prime Time Plus (Residential Load Management) is a residential load management program designed to alter the Utility's system load curve by reducing summer and winter demand peaks. Customers participating in Prime Time Plus will receive monthly incentive credits on their electric bill. This program is an enhancement of a retired program with a similar name (Residential Prime Time).
- **Residential Window Replacement**
The Residential Window Replacement Program offers rebates to existing residential customers to install window upgrades in existing homes.

Commercial Programs

- **Commercial/Industrial Energy Audit Programs**
Tampa Electric offers two C/I Energy Audits Programs, one free, and the other a more comprehensive audit that a customer pays for.
- **Commercial Chiller**
The Commercial Chiller Program offers rebates to C/I customers for installing high efficiency chiller equipment.

- **Cogeneration**
The Cogeneration Program incentivizes large industrial customers with waste heat or fuel resources to use their onsite energy to avoid fuel waste and install electric generating equipment. The large industrial customers may sell their surplus electric generation to TECO.
- **Conservation Value**
The Conservation Value Program offers rebates to C/I customers to invest in energy conservation measures that are not in other C/I programs.
- **Commercial Cooling**
The Commercial Cooling Program encourages C/I customers to install high efficiency direct expansion commercial air conditioning cooling equipment.
- **Demand Response**
The Demand Response Program incentivizes C/I customers to reduce electricity demand at certain peak times.
- **Facility Energy Management System**
The Facility Energy Management System Program offers customer rebates for installing a facility energy management system that provides real time operational, production and energy consumption information which enables the customer to reduce their energy consumption and demand and reducing TECO's peak demand.
- **Industrial Load Management (GSLM 2&3)**
The Industrial Load Management Program incentivizes large industrial customers to allow TECO to interrupt part or all of their electrical service during periods of peak grid stress.
- **Street and Outdoor Lighting Conversion**
The Street and Outdoor Lighting Conversion Program is designed to encourage the conversion from Non-Light Emitting Diode ("LED") street and outdoor lighting luminaires to eligible LED luminaires in a five-year program. The goal of this program is to install energy efficient LED street and outdoor lighting technology to reduce the energy consumption and demand and reducing TECO's peak demand.
- **Lighting Conditioned Space**
The Lighting Conditioned Space Program encourages C/I customers to invest in more efficient lighting technologies in existing conditioned areas of C/I facilities.
- **Lighting Non-Conditioned Space**
The Lighting Non-Conditioned Space Program encourages C/I customers to invest in more efficient lighting technologies in existing non-conditioned areas of C/I facilities.
- **Lighting Occupancy Sensors**
The Lighting Occupancy Sensors Program encourages C/I customers to install occupancy sensors to control C/I lighting systems.

- **Commercial Load Management (GSLM 1)**
The Commercial Load Management Program incentivizes C/I customers to allow TECO to control weather-sensitive heating, cooling, and water heating systems to reduce the associated weather-sensitive peak demand.
- **Commercial Smart Thermostats**
The Commercial Smart Thermostats Program offers customer rebates for installing smart thermostats to help reduce their demand while reducing TECO's weather sensitive peak demand.
- **Standby Generator**
The Standby Generator Program incentivizes C/I customers to use available emergency electrical generation capacity to reduce weather-sensitive peak demand on the grid.
- **Variable Frequency Drive for Compressors**
The Variable Frequency Drive for Compressors Program offers customer rebates for installing variable frequency drives to their new or existing refrigerant or air compressor motors to help reduce their demand while reducing TECO's weather sensitive peak demand.
- **Commercial Water Heating**
The Commercial Water Heating Program encourages C/I customers to install high efficiency water heating systems.

Other Programs

- **Conservation Research and Development**
The Conservation Research and Development Program allows TECO to explore DSM measures that have insufficient data on cost-effectiveness and the impact on TECO's ratepayers.
- **Integrated Renewable Energy System (Pilot Program)**
The commercial/industrial Integrated Renewable Energy System is a five-year pilot program to study the capabilities and DSM opportunities of a fully integrated renewable energy system. The integrated renewable energy system will also be used as an education platform for commercial and industrial customers.
- **Renewable Energy**
The Renewable Energy (Sun to Go) Program delivers renewable energy options to TECO's customers through program administration, renewable electricity generation, evaluation of potential new renewable sources, and market research.

D. Florida Public Utilities Company

Residential Programs

- **Residential Energy Survey**

In the Residential Energy Survey Program, FPUC offers in-home and online audits which provides the customer with specific whole-house energy efficiency recommendations, a list of blower-door test contractors who can check for duct leakage, and a conservation kit.

- **Residential Heating and Cooling Efficiency Upgrade**

The Residential Heating and Cooling Upgrade Program incentivizes customers operating inefficient heat pumps and air conditioners to replace them with more efficient units.

Commercial Programs

- **Commercial Energy Consultation**

In the Commercial Energy Consultation Program, FPUC energy conservation representatives conduct commercial site visits to assess the potential for applicable DSM programs, educate customers about FPUC's commercial DSM programs, conduct a bill review, offer energy savings suggestions, and inform customers about commercial online resources and tools.

- **Commercial Heating and Cooling Efficiency Upgrade**

The Commercial Heating and Cooling Upgrade Program provides rebates to small commercial customers (customers with a maximum of 5-ton units) if the customers install a high-efficiency central air conditioner or heat pump with a minimum 15 SEER.

- **Commercial Reflective Roof**

The Commercial Reflective Roof Program provides rebates to non-residential customers and contractors who convert or install a new cool roof on existing facilities or on new building construction. The roofing material must be Energy Star Certified.

- **Commercial Chiller Upgrade**

The Commercial Chiller Upgrade Program offers commercial customers who replace existing chillers with a more efficient system, an incentive of up to \$100 per kW of additional savings above the minimum efficiency levels.

Other Programs

- **Conservation Demonstration and Development**

The Conservation Demonstration and Development Program researches energy efficiency and conservation projects to identify, develop, demonstrate, and evaluate promising end-use energy efficient technologies across a wide variety of applications. In 2019, FPUC installed two battery storage systems to improve customer electric system reliability and resiliency, and has extended this study with completion expected in 2021.

- **Low-Income Energy Outreach**

The Low-Income Energy Outreach Program partners with Department of Economic Opportunity approved Low-Income Weatherization Program operators to offer Residential Energy Surveys, host energy conservation events, and distribute conservation materials.

Electric FEECA Municipal Utilities

A. JEA

Residential Programs

- **Residential Energy Audit**

In the Residential Energy Audit Program, utility auditors examine homes, educate customers, and makes recommendations on low-cost or no-cost energy-saving practices and measures.

- **Residential Solar Water Heating**

The Residential Solar Water Heating Program pays a financial incentive to customers to encourage the use of solar water heating technology.

- **Neighborhood Efficiency (Low-Income)**

The Neighborhood Efficiency Program offers education on the efficient use of energy and water as well as the direct installation of an array of energy and water efficiency measures at no cost to income qualified customers.

- **Residential Efficiency Upgrade**

The Residential Efficiency Upgrade Program provides incentives to encourage the use of high efficiency HVAC and water heating. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.

- **Energy Efficient Products**

The Energy Efficient Products Program provides incentives to encourage the use of high efficiency lighting and efficient appliances. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.

- **MyWay Prepaid Program**

The MyWay Prepaid Program offers an option for all customers, especially those who prefer to prepay for services versus being billed monthly. It is consumer-focused experience for environmentally conscious consumers who like to keep their consumption in mind. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.

Commercial Programs

- **Commercial Energy Audit**

In the Commercial Energy Audit Program, JEA examines businesses, educates customers, and makes recommendations on low-cost or no-cost energy-saving practices.

- **Commercial Prescriptive Lighting Program**

Commercial Prescriptive Lighting Program pays a financial incentive to customers to encourage the use of high efficiency lighting technology.

- **Commercial Prescriptive**

The Commercial Prescriptive Program provides incentives to encourage the use of high efficiency HVAC, lighting, cooking, and water heating products. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.

- **Small Business Direct Install**

The Small Business Direct Install Program promotes the use of high efficiency HVAC, lighting, water heating, and appliances in the small business sector. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.

- **Custom Commercial**

The Custom Commercial Program promotes the use of custom efficiency measures based on specific applications for each customer. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.

B. Orlando Utilities Commission

Residential Programs

- **Home Energy Survey**

The home energy walk-through surveys were designed to provide residential customers with recommended energy efficiency measures and practices customers can implement, and to encourage participation in various OUC rebate programs. OUC provides participating customers specific tips on conservation and details on customer rebate programs.

- **Duct Repair Rebate**

This rebate program is designed to encourage residential customers to repair leaking ducts on existing systems. Qualifying customers must have an existing central air conditioning system, within certain limits and ducts must be sealed with mastic and fabric tape or any other Underwriters Laboratory (UL) approved duct tape.

- **Ceiling Insulation Rebate**
The Ceiling Insulation Rebate Program is offered to residential customers to encourage the upgrade of attic insulation.
- **High-Performance Windows Rebate**
The High Performance Windows Rebate Program encourages customers to improve energy efficiency in their homes by purchasing ENERGY STAR® rated energy efficient windows.
- **Efficient Electric Heat Pump Rebate**
The Efficient Electric Heat Pump Rebate Program provides rebates to customers in existing homes who install heat pumps having a seasonal energy efficiency ratio (SEER) of 15.0 or higher.
- **New Home Rebate**
The New Home Rebate Program offers rebates for cool/reflective roofs, block wall insulation, ceiling insulation upgrades to R-38, heat pumps, ENERGY STAR washing machines, ENERGY STAR heat pump water heaters, and solar water heaters.
- **Heat Pump Water Heater Rebate**
The program provides rebates for the heat pumps commonly known as hybrid electric heat pump water heaters for qualifying installations
- **Efficiency Delivered (Low-Income)**
The Efficiency Delivered Program is income based and provides up to \$2,500 of energy and water efficiency upgrades based on the needs of the residential customer's home. An OUC Conservation Specialist visits the home, performs a home survey, and recommends which home improvements have the most potential of lowering utility bills.

Commercial Programs

- **Energy Audit**
The Energy Audit Program includes a free survey consisting of a physical walk-through inspection of the commercial facility performed by experienced energy experts. The customer receives a written report detailing cost-effective recommendations to make the facility more energy and water efficient.
- **Efficient Electric Heat Pump Rebate**
The Efficient Electric Heat Pump Rebate Program provides rebates to qualifying customers in existing buildings who install heat pumps having a seasonal energy efficiency ratio (SEER) of 15.0 or higher.
- **Duct Repair Rebate**
This program for commercial customers provides a rebate to repair leaking ducts on existing systems. Qualifying customers must have an existing central air conditioning system of

within certain limits and ducts must be sealed with mastic and fabric tape or any other UL approved duct tape.

- **Ceiling Insulation Rebate**

The Ceiling Insulation Rebate Program for commercial customers aims to increase building resistance to heat loss and gain. Participating commercial customers receive a rebate for upgrading their attic insulation up to R-30.

- **Cool/Reflective Roof Rebate**

The Cool/Reflective Roof Rebate Program for commercial customers aims to lower roof surface temperature while increasing the lifespan of the roof. OUC provides rebates for ENERGY STAR cool/reflective roofing that has an initial solar reflectance greater than or equal to 0.70.

- **Indoor Lighting Billed Solution Program**

The Indoor Lighting Billed Solution Program assists commercial customers with investments in new lighting technologies. The program is a cash-flow neutral billed solution where the savings pay for the project's cost over the pay-back period or term.

- **Indoor Lighting Rebates Program**

The Indoor Lighting Rebates Program offers commercial customers that upgrade the efficiency of their indoor lighting a rebate if they meet certain requirements. Participation is open to facilities located within OUC's service area that receive electric service under an OUC commercial rate.

- **Custom Incentive Program**

Through the Custom Incentive Program, commercial customers receive incentives based on the reduction in peak demand their projects achieve plus the first-year energy savings.

Natural Gas FEECA Utility

A. Peoples Gas System

Residential Programs

- **Residential Customer Assisted Energy Audit**
The Residential Customer Assisted Audit is designed to save energy by increasing residential customer awareness of natural gas use in personal residences. Recommendations provided to the customer include an estimated range of energy savings including insightful advice on how to manage their overall energy usage. This audit is only available in an online format.
- **Residential New Construction**
The Residential New Construction Program is designed to save energy for new homeowners by offering incentives to builders and developers who construct new single family and multi-family homes with the installation of energy efficient natural gas appliances.
- **Residential Retrofit**
The Residential Retrofit Program offers rebates to encourage customers to make cost-effective improvements in existing residences by replacing existing electric appliances with energy efficient natural gas appliances.
- **Residential Retention**
The Residential Retention Program offers rebates to encourage new and current natural gas customers to make cost-effective improvements in existing residences by replacing existing natural gas appliances with energy efficient natural gas appliances.

Commercial/Industrial Programs

- **Commercial Walk-Through Energy Audit**
This program is designed to reduce demand and energy consumption of C/I facilities by increasing customer awareness of the energy use in their facilities.
- **Commercial New Construction**
The Commercial New Construction Program is designed to save energy for new commercial facility owners by offering incentives to commercial customers for the installation of natural gas appliances.
- **Commercial Retrofit**
The Commercial Retrofit Program is designed to encourage commercial customers to make cost-effective improvements in existing facilities by replacing electric appliances with energy efficient natural gas appliances.

- **Commercial Retrofit Combined Heat and Power (CHP)**
The Retrofit CHP Program is designed to encourage commercial customers to make cost-effective improvements in existing facilities by the installation of an energy efficient on-site natural gas-fired combined heat and power system for the simultaneous production of mechanical and thermal energy.
- **Commercial Electric Replacement**
The Commercial Electric Replacement Program is designed to encourage commercial customers to make cost-effective improvements in existing facilities by replacing electric resistance appliances with energy efficient natural gas appliances.
- **Commercial Retention**
The Commercial Retention Program is designed to encourage current natural gas commercial customers to make cost-effective improvements in existing residences by replacing existing natural gas appliances with energy efficient natural gas appliances.

Other Programs

- **Conservation Research and Development (R&D)**
The Conservation R&D Program is designed to encourage Peoples Gas System and other natural gas LDCs to pursue opportunities for individual and joint research, including testing of technologies to develop new energy conservation programs.

II. Outside Persons Who Wish to Address the Commission at Internal Affairs

Note: The records reflect that no outside persons addressed the Commission at this Internal Affairs meeting.

III. Supplemental Materials for Internal Affairs

Note: The records reflect that there were no supplemental materials provided to the Commission during this Internal Affairs meeting.

IV. Transcript

1 BEFORE THE
2 FLORIDA PUBLIC SERVICE COMMISSION

3
4
5 PROCEEDINGS: INTERNAL AFFAIRS

6 COMMISSIONERS
7 PARTICIPATING: CHAIRMAN MIKE LA ROSA
8 COMMISSIONER ART GRAHAM
9 COMMISSIONER GARY F. CLARK
 COMMISSIONER ANDREW GILES FAY
 COMMISSIONER GABRIELLA PASSIDOMO SMITH

10 DATE: Tuesday, November 4, 2025

11 TIME: Commenced: 10:50 A.M.
 Concluded: 11:30 a.m.

12 PLACE: Betty Easley Conference Center
13 Room 105
 2524 Shumard Oak Boulevard
14 Gerald L. Gunter Building
 Tallahassee, Florida

15 REPORTED BY: DEBRA R. KRICK
16 Court Reporter and
17 Notary Public in and for
 the State of Florida at Large

18
19
20 PREMIER REPORTING
21 TALLAHASSEE, FLORIDA
 (850) 894-0828

1 P R O C E E D I N G S

2 CHAIRMAN LA ROSA: All right. Right on time.
3 I was hoping to hear the Song of the Month.

4 COMMISSIONER FAY: We heard it.

5 MR. BAEZ: We all heard it.

6 COMMISSIONER GRAHAM: It was on the loop
7 thing.

8 CHAIRMAN LA ROSA: So as I left the hearing
9 room, if you didn't -- if you walked out, you heard
10 it in the background. Of course, that's where the
11 controls are, so, yes, it was Dolly Parton's 9 to
12 5, right. Dolly Parton's 9 to 5 was the Song of
13 the Month submitted by Adria Harper, Hannah Barker
14 and Jeff Bates. Wow, that was, I mean, a team that
15 suggested that, but where is Adam? Adam had a
16 convincing reason of why that should be, and I will
17 tell you how that came about.

18 So Song of the Month is selected. No one
19 knows how we do it, right. That's going to be
20 undisclosed for a long time. Maybe Commissioner
21 Passidomo, if she continues, maybe she will explain
22 why she picks the Song of the Month. I don't know.
23 No pressure.

24 COMMISSIONER PASSIDOMO SMITH: Yeah.

25 CHAIRMAN LA ROSA: So it came up in to Coffee

1 Talks. I allowed our group at Coffee Talks. to
2 vote, and somehow Adam was so convincing that we
3 just went with it, right. So we did. So Song of
4 the Month 9 to 5 by Dolly Parton, and welcome to
5 this -- today is November 4th. This is our
6 Internal Affairs meeting. I forgot to open the
7 meeting, and good morning, everybody.

8 So the other important thing, the most
9 important thing we do at Internal Affairs is to
10 talk about our Employee of the Month. This month,
11 for November, is Mr. Sergio Smith with the Office
12 of Consumer Assistance.

13 Is Sergio here? Is Sergio here? All right.
14 I surprised -- he is not here. I surprised Sergio
15 this morning, right. Cindy was there. She knows.
16 And he was very shocked and was pleasantly
17 surprised.

18 Sergio is a Regulatory Analyst IV in the
19 Office of Consumer Assistance. He excels as the
20 process review team member expertly handling
21 customers with more complex complaint cases. Those
22 seem to be interesting, often involving monetary
23 disputes, current diversion accusations and
24 curiosity in high bills. So Sergio certainly is at
25 a tense point when talking to customers, but he

1 does a great job doing that.

2 Sergio regularly receives opinions and
3 inquiries from the public, and provides
4 well-informed explanations and information about
5 the Commission and its activities. With his
6 professionalism and extensive knowledge of the PSC,
7 his statutory authority and its rule, Sergio will
8 begin providing OCA witness testimony in upcoming
9 rate cases. I thought that was awesome. I told
10 him that when I saw and spoke to him this morning.

11 He is an extremely conscientious employee who
12 consistently strives to do his best. Sergio is an
13 asset to the Office of Consumer Assistance, to the
14 PSC and to the customers of Florida in which we
15 regulate their utilities. So please help me
16 welcome and congratulate Sergio Smith on Employee
17 of the Month.

18 (Applause.)

19 CHAIRMAN LA ROSA: Awesome. So the reason it
20 was 9 to 5 by Dolly Parton is because we have got a
21 lot of work in front of us today. This is a
22 lengthy Internal Affairs meeting. So let's go
23 ahead and waste no time and let's start with the
24 Draft Report on the Lifeline Assistance. I believe
25 that's where we are going first.

1 MR. DAY: Good morning, Commissioners. Sam
2 Day with the Office of Industry Development and
3 Market Analysis.

4 Item 1 is staff's 2025 Lifeline Report to the
5 Governor and Legislature. It details Lifeline
6 participation trends, regulatory actions impacting
7 the Lifeline program, and Lifeline awareness
8 programs in Florida.

9 During this reporting period, staff observed a
10 57-percent increase in Florida's subscribership
11 driven by a -- driven by 13 newly designated ETCs
12 acquiring eligible customers. As of July 2025, one
13 of these newly designated ETCs Global Connection
14 Inc. of America now has the largest number of
15 Lifeline participants in the state.

16 Staff requests editorial privileges to address
17 any non-substantive changes and numerical updates.
18 Staff is seeking approval of this report, and we
19 are available for any questions.

20 CHAIRMAN LA ROSA: Commissioners, questions on
21 the Lifeline report? I do not see any. Is there
22 approval?

23 COMMISSIONER PASSIDOMO SMITH: I move to
24 approve the report.

25 COMMISSIONER CLARK: Second.

1 CHAIRMAN LA ROSA: Move to approve the report,
2 and there is a second.

3 All those in favor signify by saying yay.
4 (Chorus of yays.)

5 CHAIRMAN LA ROSA: Yay.
6 Opposed no?

7 (No response.)

8 CHAIRMAN LA ROSA: Show that the report moves
9 forward.

10 I should ask the staff, that was cool, right?
11 I do not -- I do need to take a vote on this?
12 That's what I thought. I am getting the hang of
13 this chairmanship.

14 MR. BAEZ: Not a moment too soon.

15 CHAIRMAN LA ROSA: Commissioner Passidomo
16 Smith, I say, here you go. Hopefully I led you --
17 led well. Please don't mess up as many times as I
18 did. All good.

19 All right. So next up is?

20 MR. LONG: Item 2.

21 CHAIRMAN LA ROSA: Yeah, Item 2.

22 MR. LONG: Good morning, Commissioners. I am
23 mark Long with the IDM staff. And Item 2 is the
24 2025 Telecom RAF Report. Staff is seeking approval
25 of the draft, and seeking editorial privileges for

1 typos and such.

2 CHAIRMAN LA ROSA: Important thing to do.

3 Commissioners, are there questions on the RAF
4 report? Questions on the RAF report? Seeing none.

5 COMMISSIONER CLARK: Move to approve, Mr.
6 Chairman.

7 COMMISSIONER PASSIDOMO SMITH: Second.

8 CHAIRMAN LA ROSA: Hearing a motion, and
9 hearing a second hearing.

10 All those in favor signify by saying yay.

11 (Chorus of yays.)

12 CHAIRMAN LA ROSA: Yay.

13 Opposed no?

14 (No response.)

15 CHAIRMAN LA ROSA: Show that the RAF Report
16 moves forward.

17 Thank you very much, Mr. Long.

18 All right. I will allow folks to come in and
19 get settled. Our next report is our Ten-Year Site
20 Plan. I am not sure who is kicking us off, but,
21 Mr. Davis, you through your card down first. You
22 look like you are ready to go.

23 MR. DAVIS: Yes, sir. I don't know if I need
24 this thing or not, but, you know, I have it there.

25 Okay. I am Greg Davis, with the Commission

1 staff in the Engineering division.

2 Item No. 3 is the Draft Review of the 2025
3 Ten-Year Site Plans of Florida's electric
4 utilities. This year's review is in the same
5 format and contains similar content as last year's
6 review.

7 Staff reviewed each of the utility's site
8 plans and the state as a whole. Overall, adequate
9 reserve margins for summer and winter are projected
10 to be maintained by the electric utilities
11 statewide.

12 Natural gas continues to provide most of the
13 net energy for load, but its contribution is
14 forecasted to decrease from 72.7 percent in 2024 to
15 58 percent in 2034. During the same period, solar
16 is expected to increase from 6.8 percent in 2024 to
17 make up 27.7 percent net energy for load. In
18 addition, energy storage is projected to grow
19 significantly with an additional 10,000 megawatts
20 within the ten-year period.

21 The review considers the affects of new
22 technologies and trends such as data centers, which
23 can impact the growing energy demand and energy
24 storage, which can help utilities control demand on
25 the utility side and other new generation needed to

1 meet Florida's future energy requirements.

2 Staff seeks the Commission's approval of the
3 draft review of the 2025 Ten-Year Site Plans, which
4 will find each utility's plan suitable for planning
5 purposes.

6 If the Commission approves the draft as
7 suitable, the review and any comments received will
8 be provided to the Department of Environmental
9 Protection for consideration in future need
10 determination proceedings, and the Department of
11 Agriculture and Consumer Services regarding fuel
12 and load forecast.

13 Staff also seeks administrative authority to
14 make minor edits if needed.

15 Staff is available for any questions.

16 CHAIRMAN LA ROSA: Great. Thank you,
17 Mr. Davis.

18 Commissioners, are there any questions of the
19 Ten-Year Site Plan?

20 Seeing none, just I will make a quick
21 comments. I know we have got the emerging trends
22 segment in here. I know you referenced that as
23 part of your summary. I think that's a great thing
24 moving forward. I am happy to see it, of course,
25 in this report. And as we see so many changes,

1 that's kind of like a catchall, where we get to
2 drop in some of the things that maybe are a little
3 bit more harder to quantify but, of course, we see
4 throughout the industry, so thank you for including
5 that.

6 Commissioner Clark.

7 COMMISSIONER CLARK: I would add just a note,
8 Mr. Chairman. I realize we were approving this for
9 planning purposes, suitable for planning purposes,
10 not a stamp or an endorsement on particularly
11 anything that is planned here for future of the
12 utilities. I probably have a lot of questions for
13 the utilities themselves, but I don't think it's
14 anything that staff can direct can help with.

15 CHAIRMAN LA ROSA: I agree. Making that
16 point, that it's -- the motion, as it comes, will
17 be is it suitable or not? Excellent.

18 Commissioners, any further questions? Seeing
19 none.

20 COMMISSIONER CLARK: Move to approve, Mr.
21 Chairman.

22 COMMISSIONER PASSIDOMO SMITH: Second.

23 CHAIRMAN LA ROSA: Hearing a motion to
24 approve, and hearing a second.

25 All those in favor signify by saying yay.

1 (Chorus of yays.)

2 CHAIRMAN LA ROSA: Yay.

3 Opposed no?

4 (No response.)

5 CHAIRMAN LA ROSA: Show that the report is
6 suitable to move forward.

7 Thank you.

8 MR. DAVIS: Thank you.

9 CHAIRMAN LA ROSA: All right. So let's move
10 to our Draft 2025 Status Report on Storm Protection
11 Plan activities.

12 MS. BUYS: Good morning, Commissioners, I am
13 Penolope Buys with the Division of Engineering.

14 Item 4 is the Draft Annual Report on the Storm
15 Protection Plan Protection Activities of the
16 Florida Investor-Owned Utilities.

17 Pursuant to Section 366.96(10), Florida
18 Statutes, the Commission is required to submit to
19 the Governor, the President of the Senate and the
20 Speaker of the House of Representatives an annual
21 status report of the IOUs' storm protection
22 activities. The report reflects data from the 2022
23 through 2031 SPPs, and the most recent annual
24 status report updates provided by the IOUs. The
25 recently approved SPPs are for the time period 2026

1 through 2035. And that data will be included in
2 next year's report.

3 In addition, since more than 95 percent of the
4 SPP costs are now recovered through the Storm
5 Protection Plan Cost Recovery Clause, and not in
6 base rates, the costs and the resulting bill
7 impacts contained in the report are based on the
8 SPPCRC factors only. The report must be submitted
9 no later than December 1st.

10 The Commission is not drawing any conclusions
11 or making any findings in this report. Any
12 findings about the current or future storm
13 protection program cost recovery will be considered
14 as a docketed proceeding and subsequent Commission
15 order.

16 Staff is seeking your approval of the report,
17 as well as administrative authorities to make minor
18 edits, if needed.

19 Thank you.

20 CHAIRMAN LA ROSA: Great. Thank you, Ms.
21 Buys.

22 Commissioners, questions? Discussions?
23 Seeing none, open for a motion.

24 COMMISSIONER CLARK: Move to approve, Mr.
25 Chairman.

1 COMMISSIONER PASSIDOMO SMITH: Second.

2 CHAIRMAN LA ROSA: Hearing a motion, and
3 hearing a second hearing.

4 All those in favor signify by saying yay.
5 (Chorus of yays.)

6 CHAIRMAN LA ROSA: Yay.

7 Opposed no?

8 (No response.)

9 CHAIRMAN LA ROSA: Show that the report passes
10 to move forward.

11 Great. Thank you very much.

12 All right. So our next item in -- in place
13 ready to go, Item No. 5 on our Agenda here is the
14 2025 Annual Report on Activities Pursuant to
15 Florida Energy Efficiency and Conservation Act.

16 Gentlemen, thank you for being ready to roll.

17 MR. PREWETT: Good morning, I am Devan Prewett
18 with the Division of Economics.

19 Item 5 is the Draft of the Annual Report on
20 Activities Pursuant to the Florida Energy
21 Efficiency and Conservation Act, also known as
22 FEECA.

23 Section 366.82(10) of the Florida Statutes
24 requires the Commission to submit this report
25 annually to the Governor and the Legislature by

1 March 1st, 2026. This report summarizes each
2 utility's DSM program results and other information
3 from 2024.

4 This draft also has two placeholder entries in
5 it that will be populated later this month, and
6 both are waiting on Commission decisions from
7 docket matters.

8 Staff is seeking approval of this draft of the
9 2025 FEECA report and authorization to correct any
10 scrivener's errors that are identified before the
11 report is published.

12 As we have done before, we also request
13 permission to collaborate with the Chairman and
14 Executive Director's offices for signatures on the
15 distribution letters that go with this report when
16 we send copies to the Governor, the Florida
17 Legislature, the Department of Agriculture and
18 Consumer Services and the State Library.

19 Thank you.

20 CHAIRMAN LA ROSA: Thank you for the summary.

21 Commissioners, are there questions?

22 Seeing no questions, open for a motion.

23 COMMISSIONER CLARK: Move to approve, Mr.

24 Chairman.

25 COMMISSIONER PASSIDOMO SMITH: Second.

1 CHAIRMAN LA ROSA: Hearing a motion, and
2 hearing a second.

3 All those in favor signify by saying yay.
4 (Chorus of yays.)

5 CHAIRMAN LA ROSA: Yay.
6 Opposed no?

7 (No response.)

8 CHAIRMAN LA ROSA: Show that the report moves
9 forward. Excellent. Great. Thank you.

10 I am waiting for someone to question the
11 authority of the letter from the Chairman to go out
12 accompanying that report. No one wanted to
13 question that. That's okay. I am very
14 straightforward when I send those.

15 All right. So let's move on to -- we got a
16 lot of work today. Let's move on to our
17 legislative update.

18 Mr. Franks, this is your time of the year,
19 right?

20 MR. FRANK: It is, yes.

21 Good morning. Thank you, Chairman. Good
22 morning, Commissioners.

23 The 2026 legislative session is quickly
24 approaching. We are now in week three of interim
25 committee meetings, with session set to begin on

1 January 13th and conclude on March 13th.

2 This afternoon, Commission staff will appear
3 before the Economic Infrastructure Subcommittee to
4 present on key topics from the Commission's
5 Advanced Nuclear Report and its recent update.

6 Before I turn to the bill updates, I would
7 like to take a moment to introduce our new
8 legislative intern, Brian Loayza Arroyo. Brian
9 joins us from Florida State University's
10 Legislative Internship Program. He is a senior,
11 double majoring in International Affairs and
12 Political Science. He currently serves as the
13 treasurer of the Hispanic Honor Society, and is
14 pursuing academic certifications in Emergency
15 Management and Intelligent Studies. Brian will be
16 assisting with all aspects of our legislative
17 affairs work. We are very excited to be beginning
18 this new partnership with Florida State, and to
19 welcome Brian to the team.

20 So with that, I will turn it over to Brian to
21 introduce himself and present Senate Bill 126.

22 MR. ARROYO: Good morning, Commissioners. I
23 am Brian Loayza Arroyo. I am very excited for this
24 internship opportunity, and I can't wait to learn
25 more about state government and the legislative

1 process.

2 One bill we are tracking is Senate Bill 126,
3 titled Florida Public Service Commission, Senator
4 Don Gaetz. This includes several provisions
5 affecting the Commission. It would expand the
6 number of Commissioners from five to seven,
7 requiring that one be a certified public accountant
8 and one a charter financial analyst; limited return
9 on equity to be the national average for comparable
10 utilities; require all Commission orders to include
11 adequate support, rationale and discussion of key
12 factors; require detailed explanations in orders
13 that approve or deny settlements; establishes a
14 schedule for when public utilities submit requests
15 for rate changes, and require the Commission to
16 submit an annual report to the Governor and
17 Legislature, including analysis of rate models,
18 cost impacts, executive compensation data and cross
19 state comparison.

20 Thank you.

21 MR. FRANK: Thank you, Brian.

22 One key difference from Senator Gaetz's bill
23 this year compared to last session is how the ROE
24 is addressed. Last session, the bill required the
25 allowable ROE to remain closer to the risk-free

1 rate, requiring specific justification for any
2 deviation. As Brian just noted, this year's
3 proposal, instead, limits the ROE to the national
4 average of comparable utilities nationwide.

5 There is an identical House companion bill,
6 which is HB -- House Bill 187, by Representative
7 Alex Andrade.

8 Turning now to SB 200, Utilities, by Senator
9 Jennifer Bradley. This bill addresses both solar
10 facility decommissioning and storm protection
11 plans. These solar provisions grant local
12 governments greater authority to regulate the
13 decommissioning of solar facilities located on
14 agricultural land.

15 On the storm protection side, the bill would
16 require that proposed improvements, demonstrate
17 forecasted benefits exceeding forecasted costs.
18 The Commission must consider whether the costs of
19 implementing the plan is reasonable and prudent
20 given the expected benefit, and consider the
21 performance of previously approved plan
22 improvements and reducing outage times and storm
23 restoration costs. The Commission must adopt a
24 rule by October 31st, 2026.

25 Last session, we saw both these policy issues

1 addressed in separate bills. One was attached to
2 Gaetz's bill last year, Senate Bill 354, and then
3 the solar provisions were on a separate bill, SB
4 1304. So these were presented last session. Its
5 House companion is House Bill 193 by Representative
6 Nathan Boyles.

7 I next have House Bill 225, titled Consumer
8 Fairness in Utility Rates by Representative Felicia
9 Robinson. This bill requires municipalities that
10 operate water or sewer utilities within another
11 city's boundaries to charge the same base rates,
12 fees and charges as they do for their own
13 residents. Any surcharges must be directly tied to
14 actual service or infrastructure costs, cannot be
15 used as general revenue source or profit margin,
16 and must be clearly disclosed to customers.

17 The bill would require municipalities to
18 submit annual reports on surcharge revenue usage to
19 the Public Service Commission, and authorize the
20 Commission to review and rule on consumer disputes
21 involving rates, fees or surcharges. There is no
22 Senate companion at this time.

23 And then finally, we are tracking the progress
24 of our Open Government Sunset Review bill filed as
25 a proposed committee bill by the House Government

1 Operations Subcommittee. This bill removes the
2 scheduled repeal of the exemption from public
3 meeting requirements for proprietary confidential
4 business information presented in Commission
5 hearings. This proposed committee bill was
6 actually heard this morning and reported favorably,
7 so I will continue to provide updates as that moves
8 through the process.

9 That concludes the legislative update. I am
10 happy to answer any questions.

11 CHAIRMAN LA ROSA: Great. Thank you.

12 Commissioners, are there any questions? No
13 questions. Not even of Brian, who is an intern
14 sitting here at the table with us?

15 So, Brian, what is intelligent studies?

16 MR. ARROYO: Oh, currently, it's busy. It
17 relates to the intelligence field, like working the
18 three-letter federal agencies like FBI, NSA,
19 Department of State. So I have been learning more
20 into that, and I definitely want to delve into that
21 field.

22 CHAIRMAN LA ROSA: That's awesome. Cool.
23 Well, thank you for coming here.

24 MR. ARROYO: Of course.

25 CHAIRMAN LA ROSA: We are excited to have you.

1 And I got to meet you last week at Coffee Talks.
2 And thanks for having the courage to be able to
3 step up and present a bill in, like, week one being
4 an internal here.

5 MR. ARROYO: Yeah, I am very honored. Thanks
6 so much, Commissioners.

7 CHAIRMAN LA ROSA: Yeah. No. No. Awesome.
8 Awesome. So thank you, and good luck. And I can
9 already see, you are off to a great head start. So
10 thanks for being here with us today.

11 Commissioners, any questions of what's going
12 on downtown? It seems like it's early, but yet
13 there is a lot of activity.

14 Okay. Awesome. Just keep us in tune, as you
15 always do. I appreciate all the heads-up and the
16 updates that you provided as things start to get
17 rolling, and obviously, all the sidebar
18 conversations as things move so quickly, so, again,
19 thanks, and have a great session.

20 MR. FRANK: All right. Thank you. Thank you,
21 Chair.

22 CHAIRMAN LA ROSA: Thank you.

23 All right. Let's go to our General Counsel
24 here from our General Counsel and her report.

25 MS. HARPER: Good morning, Chair,

1 Commissioners.

2 I have just a quick update for you all. We
3 have been very busy working with staff on our
4 post-hearing process. Once we get past this very
5 busy rate case season, we are looking at updating
6 some of our training and some of our training
7 materials in GCL. We are developing updated
8 training on discovery in the hearing process, and
9 Shaw Stiller will be offering a training for that.
10 And we are also going to be looking at a training
11 on -- for staff witnesses that Ryan Sandy is going
12 to develop for GCL for staff to attend.

13 We are also developing updated training
14 materials for our GCL intranet page. Samantha has
15 helped leading the charge on that. So we are
16 looking forward to that. And our SLAs are helping
17 us develop some updated templates for GCL forms
18 that might bring some efficiencies for us.

19 I also wanted to mention that the Southern
20 Chapter of the Energy Bar Association is having a
21 meet-up on November 13th. It's open to all. There
22 will be a per person price that should be offered
23 for Commission staff and employees if anybody wants
24 to attend. And that's something that's going to be
25 happening in Tallahassee, and then other chapters

1 all around the country on the very same day. So
2 that's something I will be participating in, and
3 hopefully some of y'all will be able to participate
4 in that as well. And Susie is helping coordinate.
5 So if you are interesting in that, we can get you a
6 per person price if you are interested in that.

7 Also, I just wanted to mention that we are
8 encouraging -- still encouraging all of the
9 attorneys to play around a little bit with AI. We
10 have our HData here that we are using, which is
11 good. It's a closed source, so we are able to sort
12 of test that, and we have been trying to do that
13 whenever there is time. And we are also comparing
14 that to our Westlaw AI, which is different and open
15 source. So we are trying to learn how to play with
16 AI in an efficient but also safe way to make sure
17 that we are -- our information that we are gleaning
18 or reviewing through there is accurate.

19 Many of our attorneys attended Commissioner
20 Fay's presentation, and we have been talking to him
21 about some of his suggestions and trying to get
22 some expertise from him on how to use AI
23 efficiently, and also effectively and safely.

24 So I would love for Commissioner Fay to be
25 able to maybe say a few words about that if he is

1 willing to do so.

2 CHAIRMAN LA ROSA: I would love that too.

3 That would be great.

4 COMMISSIONER FAY: You have to twist my arm to
5 talk about AI.

6 No, so, I mean -- and Adria and have I had
7 conversations -- a number of conversations. I
8 think this agency is sort of poised or positioned
9 to really utilize it in the right way for a number
10 of reasons, and, you know, there are states where
11 agencies are prohibited from the use of some of
12 these tools, and I think there is some good reasons
13 for some of that, the information that we put out,
14 the sort of -- essentially, trying to keep
15 everything in-house, and the confidentiality of the
16 material that we, you know, review and look at, and
17 that sort of thing.

18 But I do think, as the growth of it has come
19 up, you do see a lot of ways of using it in the
20 wrong way, and which produces results that are
21 somewhat confusing. I think people are really
22 shocked when you put the exact same prompt into the
23 exact same model, you know, within a minute and you
24 are going to get a different answer, some variation
25 of the answer. So having folks understand the

1 closed loop, the grounding, you know, the only
2 point from that information is just really key,
3 because as all of this stuff advances when you get
4 outside of that, and use the reasoning models, it's
5 concerning that there is still a hallucination or
6 error rate that's, you know, maybe in the double
7 digits. And for the work that we do here, you
8 can't have that. It's just not -- it's not
9 acceptable for -- it's not acceptable in a lot of
10 fields, but for purposes of what we put out, and
11 the cost of the decisions and the things that it
12 impacts, you know, you really need to get it down
13 to where it's just at a extremely low number to
14 operate.

15 But I think, you know, the state, as a whole,
16 and the agencies, as a whole, will figure out ways
17 to use this in the right way. The lawyers in the
18 legal side have Westlaw and Lexis, and all of these
19 products that are coming out to make things better.
20 And then on the technical side, you see HData, but
21 you also see other companies. Deloitte is rolling
22 out a product.

23 You see them trying to get on the sort of
24 technical side of the complexities of the
25 ratemaking case. And I will say, I just spent the

1 past week in Clearwater with rate school, and it's
2 just a very interesting time, because you have all
3 of these people converging from all over the
4 country to Clearwater to learn the ratemaking
5 process, and all the complexities to it.

6 But I sort of think of it like when we used
7 the calculator in school, you know, there is this
8 quick way to get to some of these results where you
9 don't understand the foundational components of how
10 it got there. There are models where you can input
11 things from rate cases, and it will I have good you
12 an output, and it will tell you, this should be the
13 rate, or this should be the equity ratio, or
14 whatever you may include. But to fully understand
15 how you got there, and for commissions to then make
16 decisions on it, it requires, like, a lot more time
17 on the foundation of that information being
18 presented.

19 I don't think any commission is turning away
20 their authority yet, and saying there is a model
21 that can do this, right. There are some states
22 that use formulas regularly to adjust, but we are
23 not there. But we will see in a regulation field,
24 and probably other industries, where the, you know,
25 the permitting processes and compliance, they can

1 be so much more efficient, and you can get
2 government out of the way of so many of those
3 components, but still ensuring the safety and the
4 purpose of the regulation. Our regulatory compact
5 will be key to that.

6 And so I -- honestly, I am super optimistic
7 about it. I think the future is really bright with
8 it, because I do think it will find the areas that
9 some of us just despise to work on. As the
10 lawyers, we get the technical, and it's the
11 technical and the legal sort of thing, we always
12 balance that. But I think it will create some of
13 those efficiencies in a way that the accuracy is
14 high enough for our agency to utilize it.

15 So I really appreciate Adria and Braulio, and
16 pretty much anyone who will listen to me. I feel
17 like now, when I walk the hall, I see people, like,
18 scurry away to the other side because they are
19 going to want me to -- not going to want me to talk
20 about AI use.

21 But even talking with David and his team,
22 there is so many things that can be utilized from
23 an efficiency perspective to let our folks in the
24 agency to do the work that we need to do. I mean,
25 I don't know an agency that feels like they are

1 overstaffed, right, or they have lots of free time?
2 I mean, it's -- you are trying to use your
3 resources the best you can, and I think this will
4 allow it without, you know, the idea of replacing
5 roles and replacing -- we are not there yet. I
6 mean, it's -- eventually, that will be a discussion
7 that's probably had, but we just want more time to
8 do the work that we are supposed to do while we are
9 at this agency.

10 So I really appreciate, Mr. Chairman, you
11 giving me the opportunity to talk about it more,
12 and hopefully I will be able to continue to either
13 engage in the filed.

14 I am looking at SARCs and limited -- these
15 small water cases. I think they are just -- they
16 have so few resources, and the ability for them to
17 dump in documents and have it organized and
18 presented to the Commission in a way that doesn't
19 require the staff here to comb through all of that
20 to determine if something is a receipt, or an
21 invoice, or whatever it may be. I think that will
22 be really key, because those companies have always
23 struggled to put together their information and
24 present it to us in a way that is easy to turn
25 around and submit. And that's one area I think

1 that we will see some improvement.

2 So if you see me and you want to talk AI, I
3 would be happy to do it is, because I to think it
4 will help a lot on the regulatory side.

5 CHAIRMAN LA ROSA: Awesome. Thank you. Thank
6 you for your contribution just across the board,
7 right, obviously, what you are doing internally
8 within the agency, but I see the impact you have,
9 not just, you know, here in Florida, but
10 throughout, so, yeah, great work.

11 COMMISSIONER FAY: We will keep some secrets.
12 We are not going to give them all away.

13 CHAIRMAN LA ROSA: You don't have to give them
14 all away, please do that. And I will stop you in
15 the hall, I always enjoy our conversations about
16 it.

17 COMMISSIONER FAY: Thank you.

18 CHAIRMAN LA ROSA: Ms. Harper.

19 MS. HARPER: That concludes my report. Thank
20 you.

21 CHAIRMAN LA ROSA: Awesome. Great. Thank
22 you.

23 All right. Commissioners, any questions?

24 Seeing none, let's move to our General
25 Counsel. I am sorry --

1 MR. BAEZ: Thank you for the promotion.

2 CHAIRMAN LA ROSA: -- our Executive Director.

3 MR. BAEZ: I sure someone would have some
4 comments on that. Thanks, Chairman, and good
5 morning, Commissioners.

6 And I want to -- at the outset, I want to
7 thank, not just Adria, but Commissioner Fay for
8 their willingness to always, you know, to continue
9 stepping out in the forefront, because as
10 Commissioner Fay said, this is -- it presents an
11 opportunity for us with not -- which is not without
12 risks, some well known, and we are trying to get
13 over those humps. And I still believe that it does
14 provide us with an excellent way forward to address
15 a lot of challenges in a physical sense that we may
16 be coming up on in the future, some of them unknown
17 and unanticipated. So I appreciate everybody's
18 willingness to, you know, kind of make the effort,
19 and Commissioner Fay's encouraging words as well.

20 And for those of you that had any doubt,
21 Commissioner Fay's wisdom was delivered
22 organically, not artificially today, and always
23 appreciate his comments on the matter.

24 You met Brian, the legislative intern, but I
25 would be remiss if I didn't add on a little bit to

1 that and some shout-out and update about how the
2 rest of the intern -- intern effort is going along.
3 At the moment, we have got two other interns on the
4 staff.

5 Noah Dunsmore is an intern with APA currently.
6 Came to us through the Career Fair, outreach at the
7 Career Fair. And then Ayden DeMeester is in AIT,
8 management information systems major. So all parts
9 of the agency are joining the effort. My
10 understanding is there may be one or two more
11 additions in the offing.

12 The posting to the job boards begins this
13 month in anticipation of an upcoming semester. And
14 the application for internship opportunities is
15 live on our website. My understanding, it's where
16 to the employment opportunities section is. So to
17 all who are listening and have an interest, you can
18 find it there.

19 And as I had mentioned at our last meeting,
20 the APM had finalized, and it's already been
21 published, if you hadn't noticed it, 4.21, the
22 internship program.

23 We have great, you know, I am excited about
24 it. I mean, I think we are -- it's just the
25 beginning of a lot of traffic hopefully, and we

1 achieve what all our goal is, is to be a premier
2 designation, if you will, for folks continuing
3 their studies and looking for outside
4 opportunities, and that serves our purposes as well
5 in terms of recruitment and so forth. So we are
6 very excited about that.

7 If you have questions, I would be happy to
8 answer them if I can, but that's my report.

9 CHAIRMAN LA ROSA: Great. Thank you.

10 And I mean, I won't hold back on my thoughts.
11 Obviously, having an internship program I think is
12 mutually beneficial --

13 MR. BAEZ: Absolutely.

14 CHAIRMAN LA ROSA: -- not just for the
15 individual as an intern, but us as an agency, to
16 build a base for employment, and I think we have
17 seen it already a few times, where they are exposed
18 something, right. They come through thinking one
19 thing, they get exposed to something that they
20 maybe hadn't seen before. A lot of the things we
21 do sometimes are maybe kind of, like, behind the
22 scenes, right, or don't really get a whole lot of
23 spotlight, and all of a sudden you kind of realize
24 how important it is, and how much there is to
25 contribute within the agency and what we analyze,

1 because there is so much technicality, there is so
2 much detail that goes into the decisions that we
3 are making, so I am delighted to hear that.

4 MR. BAEZ: And, Chairman, if you will permit
5 me --

6 CHAIRMAN LA ROSA: Please.

7 MR. BAEZ: -- it was a big oversight on my
8 part, and I am going to get killed for this later,
9 but I had buried the punch line, and none of what
10 we are talking about today becomes possible or
11 actuated without some really, really hard work by
12 Kate Hamrick, who has put a lot of time and effort,
13 not just into drafting of APMs, and all of that
14 sort of scutwork, but to actually give of her, you
15 know, put her time and effort also to the outward
16 facing contacts and participations that have to
17 take place, along with many others who have been
18 doing it for quite some time in a more informal
19 manner for us.

20 But now that it's all starting to come
21 together, I did want to give her a shout-out
22 because her time has been super, in my mind, super
23 important in really making all of this gel, and it
24 takes a little bit of effort to coordinate, and
25 she's taking it on with great vigor, so a shout-out

1 to her --

2 CHAIRMAN LA ROSA: Great. Yeah, I know --

3 MR. BAEZ: -- this is the time.

4 CHAIRMAN LA ROSA: Yeah, certainly.

5 Certainly. Thank you, Kate, for that, and special
6 recognition to her.

7 You know, building those -- or the
8 establishing those relationships are always
9 sometimes the more difficult part, but then
10 hopefully that then kind of becomes a flow, right,
11 it becomes year-over-year.

12 MR. BAEZ: It's along game --

13 CHAIRMAN LA ROSA: Yeah.

14 MR. BAEZ: -- I mean, I as it should be.

15 CHAIRMAN LA ROSA: Yeah.

16 MR. BAEZ: You know, this is something we are
17 trying to consolidate something that lasts, and so
18 I am excited about how it's looking so far in such
19 a short time.

20 CHAIRMAN LA ROSA: Awesome. Awesome. Great.
21 Well, thank you. And all of that, I know there are
22 some folks, unspoken folks that are behind the
23 scenes helping, and thank you guys for everyone
24 that's contributing to that.

25 All right. Is there any other matters that

1 are before us?

2 All right. So there is nothing else for our
3 Internal Affairs meeting. We do have our clause
4 hearing after this. It is 11 -- almost 11:30.
5 Let's go ahead and call that meeting at 11:45. I
6 will not be late to that one. Apologies. Because
7 now I will remember the time, and it's an easy time
8 to remember, 11:45, let's go ahead and meet for our
9 clause hearing back in the hearing room.

10 So no further things before us, this Internal
11 Affairs meeting is adjourned.

12 Thank you.

13 (Proceedings concluded.)

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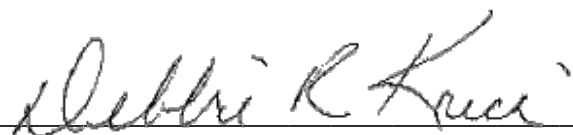
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COUNTY OF LEON)

I, DEBRA KRICK, Court Reporter, do hereby
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IT IS FURTHER CERTIFIED that I
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I FURTHER CERTIFY that I am not a relative,
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DATED this 17th day of November, 2025.


DEBRA R. KRICK
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