BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of natural gas energy conservation programs for commercial customers, by Associated Gas Distributors of Florida.	DOCKET NO. 130167-EG ORDER NO. PSC-14-0039-PAA-EG ISSUED: January 14, 2014

The following Commissioners participated in the disposition of this matter:

ART GRAHAM, Chairman
LISA POLAK EDGAR
RONALD A. BRISÉ
EDUARDO E. BALBIS
JULIE I. BROWN

PROPOSED AGENCY ACTION ORDER APPROVING ASSOCIATED GAS DISTRIBUTORS OF FLORIDA'S COMMERCIAL NATURAL GAS CONSERVATION PROGRAMS

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code (F.A.C.).

CASE BACKGROUND

Section 366.81, Florida Statutes (F.S.), the Florida Energy Efficiency Conservation Act (FEECA), gives us the authority to set conservation goals and approve programs for certain electric and natural gas utilities. Currently, only Peoples Gas System meets the eligibility requirements for us to set goals for natural gas local distribution companies (LDC) under FEECA. The remaining gas utilities, however, have voluntarily offered gas expansion programs under the auspices of this statute. On April 18, 1996, we adopted Rule 25-17.009, F.A.C., which sets forth the cost-effectiveness methodology for natural gas programs that are filed for approval. Pursuant to Rule 25-17.015, F.A.C., natural gas utilities may recover the costs associated with implementing approved programs.

Associated Gas Distributors of Florida (AGDF) is a trade association, which represents the seven investor-owned natural gas utilities: Florida City Gas, Florida Public Utilities Company, including Florida Public Utilities Company – Indiantown Division and Central Florida Gas Division, Peoples Gas System, Sebring Gas System, and St. Joe Natural Gas. These

companies are collectively referred to as LDCs and are all subject to our jurisdiction. AGDF previously represented its members in the petition for approval of natural gas conservation programs for residential customers in Docket Nos. 090122-EG and 100186-GU.[1]

On June 17, 2013, AGDF filed a petition on behalf of the above-mentioned LDCs seeking adoption of new gas programs for commercial end-use customers. AGDF seeks approval of Commercial New Construction, Commercial Retrofit, and Commercial Retention appliance rebate programs. In support of its petition, AGDF states that "the proposed commercial rebate programs meet the policies and rules of the Commission and advance the stated objectives set forth in Rule 25-17.001, F.A.C." However, the specific requirements of this rule are directed specifically toward: (1) electric utilities and their responsibility in reducing the growth rate of weather sensitive peak demand, (2) reducing the fuel costs of the most expensive forms of electric generation, (3) benefits of deferring the need for construction of additional generating capacity, and (4) the use of demand-side goals, general goals and methods to increase the overall efficiency of the bulk electric power system in Florida.

Rule 25-17.0021, F.A.C., relates to demand-side management goals for electric utilities. We are responsible for reducing the growth rates of weather-sensitive peak demand and reducing and controlling the growth rates of electric consumption through establishing numerical goals. When we evaluate proposed or modified demand-side management programs for electric utilities, the goals that were approved during the goal-setting process are the basis of the evaluation process to determine whether or not the proposed program will offer energy savings as well as meet the cost-effectiveness criteria prescribed in 25-17.008, F.A.C. We require electric utilities to consider: (1) rebound effects, (2) free riders, (3) interactions with building codes, (4) appliance efficiency standards, and (5) the utility's latest monitoring and evaluation of conservation programs and measures. Natural gas utilities, on the other hand, do not have demand-side management goals and have a separate rule prescribing the cost-effectiveness methodology.

We have jurisdiction over this matter pursuant to Sections 366.81 and 366.82, F.S.

ANALYSIS

Pursuant to Rule 25-17.009, F.A.C., each gas utility that seeks to recover costs for an existing, new, or modified demand-side management program shall file the cost-effectiveness test results of the Participants Test and the Gas Rate Impact Measure (G-RIM) Test in the format set forth in the Form PSC/RAD 14-G (4/96), entitled the *Florida Public Service Commission Cost-Effectiveness Manual for Natural Gas Utility Demand-Side Management Programs (Cost-Effectiveness Manual)*. AGDF contracted with Florida Solar Energy Center (FSEC) to develop a modified cost-effectiveness model specifically for the commercial customer market at issue in the instant docket. Programs offered are considered to be cost-effective if they pass the

[1] See Order Nos. PSC-10-0013-PAA-EG, issued February 25, 2010, Docket No. 090122-EG, In re: Petition for approval of modifications to approved energy conservation programs, by Associated Gas Distributors of Florida; and PSC-10-0551-PAA-EG, issued September 2, 2010, in Docket No. 100186-EG, In re: Petition for approval of natural gas residential energy conservation programs by Associated Gas Distributors of Florida.

Participants and G-RIM Tests with a score of one (1.00) or greater, indicating that estimated program benefits exceed estimated costs.

Program Compliance with FEECA Objectives

The goal of the proposed commercial conservation programs is to increase the direct end-use of efficient natural gas appliances and equipment in Florida buildings consistent with Section 366.81, F.S. In its petition, AGDF states "increasing the direct end-use of gas by consumers can ultimately reduce the total quantities of natural gas used in Florida." In support of its assertion, AGDF cited a study prepared by Black & Veatch for the American Gas Foundation entitled *Direct Use of Natural Gas: Implications for Power Generation, Energy Efficiency, and Carbon Emissions*. We reviewed this study and, in general, find its conclusion to be reasonable. It should be noted that we historically have not approved gas programs on the basis of displacing electric generation, nor is this a requirement under existing rules for approving programs.

Discussion of the Proposed Programs

AGDF states that the proposed commercial programs are somewhat similar to the residential conservation programs previously approved by the Commission[2] and would act as a supplement to various commercial energy conservation programs currently offered by some of the AGDF member utilities. Upon approval of the proposed programs, however, each utility offering previously approved commercial programs would be responsible for ensuring that none of the respective commercial customers receive double incentive amounts.

AGDF proposes five programs for its commercial customers. AGDF states that the purpose of the proposed programs is to educate, inform, and encourage its commercial customers either to build with natural gas (New Construction), to continue using natural gas (Retention), or to convert to natural gas (Retrofit) for their energy needs. The programs offer cash incentives to assist with defraying the costs associated with the installation of natural gas supply lines, internal piping, venting and equipment. The five proposed commercial programs are:

- Small Commercial Food Service Rebate Program
- Large Commercial Non-Food Service Program
- Large Commercial Food Service Program
- Large Commercial Hospitality Program
- Large Commercial Cleaning Service Program

The proposed programs will allow the companies to provide natural gas appliance incentives to new construction, retrofit, or retention customer types. The incentives then could be used towards the purchase and installation of appliances for specific building types and market sizes. Such appliances include tank water heaters, tankless water heaters, ranges/ovens, fryers, and dryers.

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[2] See Order No. PSC-10-0551-PAA-EG, issued September 2, 2010, in Docket No. 100186-EG, In re: Petition for approval of natural gas residential energy conservation programs by Associated Gas Distributors of Florida.

AGDF contends that the creation of a uniform Commercial appliance rebate program for all its member LDCs allows the utilities to promote the programs in a concise and consistent manner throughout the entire state of Florida. This is similar to how AGDF companies currently market their residential programs, which AGDF believes allows utilities to achieve more value for their advertising dollar.

AGDF contends that the proposed incentives will be the same for all LDCs with the exception of Indiantown due to Indiantown's smaller customer base, which impacts the calculation of the program costs across its customer base. AGDF further states the reason for the variation is due to the differences in the G-RIM and Participants scores. AGDF asserts that having uniform incentive amounts will allow for a collaborative marketing effort throughout the state that could lead to lower marketing and communication costs. While AGDF has proposed to offer rebates for the proposed appliances ranging from $450 to $3,000, some LDCs do not plan to offer rebates in every market category. The proposed incentive amounts for specific appliances by each company program are set out in Attachment A.

AGDF states that, in addition to statewide marketing efforts, each LDC will have the flexibility to craft individual marketing campaigns to promote the proposed programs to its respective customer bases. Most of the proposed commercial conservation programs marketing strategies will be similar to those of the previously approved residential conservation programs in that the utilities will also employ a collaborative effort to promote the proposed programs. These marketing strategies include posting information regarding the programs with the Department of Agriculture and Consumer Services Energy Office Energy Clearinghouse, and the Florida Natural Gas Association, as well as on each utility's website.

Cost-Effectiveness of Proposed Programs

AGDF provided an analysis of the proposed commercial programs for each member LDC. The analysis included cost-effectiveness tests for each of the five programs based on building size. The proposed commercial programs were evaluated using the Participants Test and the G-RIM, as required by Rule 25-17.009, F.A.C. The rule requires that each gas utility that seeks to recover costs for existing, new, or modified demand-side management programs shall perform a cost-effectiveness assessment using these tests. As long as the proposed program passes with a score of one (1.00) or greater, the program is considered to be cost-effective. These programs are considered beneficial for a utility to offer to its customers because the estimated benefits of the program are expected to be greater than the costs.

AGDF used our *Cost-Effectiveness Manual* as a baseline to determine the cost-effectiveness of its proposed programs and employed Florida Solar Energy Center (FSEC) to develop a modified model specifically for the commercial customer market. The modified model included information gathered from FSEC's knowledge of Florida-specific commercial building energy consumption and appliance data. The projected commercial program participants were derived using Florida Public Utilities Company's historical participation rates from its residential rebate programs because Florida Public Utilities Company has a diverse customer base with high

concentrations of customers in South and Central Florida. Florida Public Utilities Company also maintains internal accounting itemization of residential rebate cost data. AGDF estimated the projected commercial program participation by first establishing a baseline of residential participation rates. Next, AGDF applied that ratio to each member LDC's commercial customer base. The FSEC model also estimated carbon dioxide (CO_2) reductions realized by utilizing end-use natural gas appliances benchmarked against similar electric appliances. We note that the CO_2 reductions were not included in the cost-effectiveness benefits.

After review of the cost-effectiveness analysis conducted for each LDC, we find that, overall, the sources of the data are reasonable and the tests performed as instructed by our *Cost-Effectiveness Manual*. In addition, each program for each LDC passed the Participant Test and the G-RIM with scores above 1.00, indicating the programs are cost-effective and beneficial for each utility to offer to its customers.

Figure 1 below illustrates the range of the G-RIM and Participant Test scores calculated for all the AGDF utilities. The individual program results of the cost-effectiveness tests, along with the proposed incentives for each appliance for each utility are set out in Attachment A.

Figure 1: Range of G-RIM and Participant Test Scores for Proposed Commercial Programs

Commercial Building Type	G-RIM		Participant Test	
	Lowest Score	Highest Score	Lowest Score	Highest Score
Small Food Service	1.164	2.006	1.004	2.979
Large Non-Food Service	1.005	1.701	1.374	2.372
Large Food Service	1.005	1.837	1.085	2.993
Large Hospitality	1.004	1.855	1.012	2.931
Large Cleaning Service	1.003	2.167	1.141	3.037

We are concerned, however, with AGDF's assumption that bases future participation of commercial customers in the proposed programs on historic participation rates of the previously approved residential programs. Although we agree with the cost-effectiveness methodology utilized by FSEC, we believe that residential and commercial customers make investment decisions differently. As such, we are concerned that uncertainty exists in the G-RIM Test scores for the proposed commercial programs. In addition, we also note that AGDF assumed full participation rates in the first year of each program. If these participation rates are not achieved in the early years of the program, this assumption would tend to overstate the positive G-RIM economic benefits.

Participation rates are also influenced by the incentive levels offered by the utilities. One aspect of this factor is "free riders." Free riders are customers who receive incentives for measures they would have likely undertaken even without the incentives, and therefore, should not receive incentive funds paid by a utility's general body of ratepayers. In response to Commission staff's data request regarding whether the concept of free riders was considered in

AGDF's evaluation of the proposed programs, AGDF responded that "only electric utilities are required to address this issue," and that free riders are typically addressed during the DSM goal setting phase." AGDF further stated in its response to Commission staff's data requests that "PSC Rules do not require the Natural Gas DSM Programs to project a 10-year participation forecast, and that free riders were not addressed within the design of the cost-effectiveness model."

Rule 25-17.0021(3), F.A.C., – the requirements for electric utilities – addresses free riders during the goal-setting process for electric utilities. Currently, Rule 25-17.0021, F.A.C., does not require natural gas utilities to address the concept of free riders. Since this is a key factor in determining whether or not the programs are cost-effective and are in the best interest of the general body of ratepayers, we intend to conduct workshops with industry to review if additional factors should be considered in future petitions filed by natural gas utilities. While we believe that natural gas conservation programs are generally in the public interest, we would like to explore whether the current natural gas conservation rules require the necessary information to fully assess the benefits and costs of these types of programs.

Ratepayer Impact

The costs of AGDF's proposed commercial programs will be recovered through the Natural Gas Cost Recovery Clause and will be spread across all ratepayer classes, including the residential customers, subject to our review. AGDF provided the estimated effect of the proposed programs on each utility's average residential bill. The estimated impact on a residential customer's monthly bill ranges from $0.12 to $0.45. Figure 2 below illustrates the monthly bill impact for a typical residential gas customer who uses 20 therms per month.

Figure 2: Residential Bill Impact

Company	Monthly Impact per Consumer Bill*
Florida Division of Chesapeake Utilities Corp.	$ 0.12
Florida City Gas	$ 0.24
Florida Public Utilities Company	$ 0.18
Indiantown Gas Company	$ 0.14
Peoples Gas System	$ 0.14
St. Joe Natural Gas Company	$ 0.43
Sebring Gas System	$ 0.45

*Assuming consumption at 20 therms/month

Program Monitoring

As previously discussed above, AGDF assumes that participation in the proposed commercial appliance conservation programs will mirror the historic participation rates observed in the approved residential appliance conservation programs. AGDF also assumes that the

proposed commercial programs will experience full participation from year one of implementing the programs. We are concerned that commercial customers may not participate in conservation programs in the same manner as residential customers and that the free rider issue is not fully addressed. Under the existing rules, however, there is no requirement that these and other factors affecting the economic impact of gas programs be reported as a condition of approving the programs.

Our electric rules on energy conservation contain more guidelines than those currently encompassed in the natural gas conservation rules and we believe the appropriateness of similar principles should be explored for natural gas utilities. Therefore, we will be initiating discussions with industry, through workshops, to determine whether the current natural gas conservation rules should be revised in order to be more consistent with the filing requirements for the electric utilities.

DECISION

We approve AGDF's proposed natural gas energy conservation programs for commercial customers as the programs meet our current rules and appear to be cost-effective under our current required methodology. The natural gas industry can lower costs to all customers by expanding sales up to the point that capital expansion costs to serve this new load plus incentive payments are less than the marginal revenues generated by the programs. Under such conditions, load expansion programs can offer benefits for all customers and it is on this basis that we have a relatively high degree of confidence that these programs are beneficial. To ensure that the programs remain cost-effective, however, we will monitor the participation rates, rebate levels, and program costs as part of our Natural Gas Cost Recovery Clause proceedings.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that Associated Gas Distributors of Florida's proposed commercial natural gas conservation programs are hereby approved. It is further

ORDERED that the new programs' participation rates, rebate levels, and program costs shall be monitored as part of our Natural Gas Cost Recovery Clause proceedings, in order to ensure that the programs remain cost-effective. It is further

ORDERED that Commission staff initiate discussion with industry, through workshops, to gather information on whether the current natural gas conservation rules should be revised in order to be more consistent with the filing requirements for the electric utilities.

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, F.A.C., is received by the Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that, if no timely protest is filed and this Order becomes final, then this docket shall be closed upon the issuance of a Consummating Order.

By ORDER of the Florida Public Service Commission this 14th day of January, 2014.

Carlotta S Stauffer

CARLOTTA S. STAUFFER
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
(850) 413-6770
www.floridapsc.com

Copies furnished: A copy of this document is provided to the parties of record at the time of issuance and, if applicable, interested persons.

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NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on February 4, 2014.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this/these docket(s) before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

Gas Utility Appliance Cost-Effectiveness Results

Small Food Service Program	Cntrl FL Gas			FL City Gas			FPUC			Indiantown			Peoples			St. Joe			Sebring Gas		
New Construction:	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test
Tank W/H	$ 1,000	1.231	1.347	$1,000	1.651	1.623	$1,000	1.551	1.859	$1,000	2.436	1.069	$1,000	1.343	1.323	$1,000	1.387	1.616	$1,000	1.402	1.964
Tankless W/H	$ 2,000	1.495	1.342	$2,000	2.053	1.518	$2,000	1.930	1.729	$1,500	2.976	1.029	$2,000	1.671	1.266	$2,000	1.716	1.543	$2,000	1.744	1.841
Range/Oven	$ 1,000	1.574	1.305	$1,000	1.302	1.350	$1,000	1.954	1.755	$1,000	2.960	1.019	$1,000	1.708	1.282	$1,000	1.749	1.560	$1,000	1.775	1.867
Fryer	$ 3,000	1.004	1.174	$3,000	2.077	1.549	$3,000	1.223	1.519	$1,000	1.748	1.025	$3,000	1.067	1.168	$3,000	1.093	1.391	$3,000	1.110	1.626
Retrofit:																					
Tank W/H	$ 1,500	1.215	1.378	$1,500	1.661	1.594	$1,500	1.561	1.822	$1,000	2.436	1.069	$1,500	1.352	1.307	$1,500	1.395	1.591	$1,500	1.411	1.928
Tankless W/H	$ 2,500	1.505	1.323	$2,500	2.067	1.483	$2,500	1.943	1.687	$1,500	2.976	1.030	$2,500	1.682	1.246	$2,500	1.728	1.513	$2,500	1.756	1.798
Range/Oven	$ 1,500	1.574	1.305	$1,500	2.098	1.488	$1,500	1.960	1.767	$1,000	2.960	1.019	$1,500	1.717	1.244	$1,500	1.767	1.510	$1,500	1.794	1.793
Fryer	$ 3,000	1.004	1.174	$3,000	1.302	1.350	$3,000	1.228	1.528	$1,000	1.748	1.025	$3,000	1.061	1.164	$3,000	1.093	1.391	$3,000	1.110	1.626
Retention:																					
Tank W/H	$ 1,000	1.218	1.454	$1,000	1.656	1.733	$1,000	1.556	2.006	$1,000	2.438	1.132	$1,000	1.350	1.410	$1,000	1.388	1.699	$1,000	1.404	2.089
Tankless W/H	$ 2,000	1.500	1.424	$2,000	2.061	1.629	$2,000	1.938	1.877	$1,500	2.979	1.097	$2,000	1.682	1.358	$2,000	1.719	1.629	$2,000	1.748	1.967
Range/Oven	$ 1,000	1.566	1.409	$1,000	2.091	1.648	$1,000	1.973	1.900	$1,000	2.965	1.085	$1,000	1.717	1.371	$1,000	1.772	1.630	$1,000	1.792	1.985
Fryer	$ 3,000	1.009	1.228	$3,000	1.311	1.425	$3,000	1.236	1.625	$1,000	1.751	1.091	$3,000	1.073	1.242	$3,000	1.108	1.444	$3,000	1.120	1.714

Gas Utility Appliance Cost-Effectiveness Results

Large Non-Food Service Program	Cntrl FL Gas			FL City Gas			FPUC			Indiantown			Peoples			St. Joe			Sebring Gas		
New Construction:	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test
Tank W/H	$ 1,500	1.374	1.220	$1,500	1.761	1.342	$1,500	1.674	1.515	$ 400	2.275	1.040	$1,500	1.482	1.161	$1,500	1.391	1.520	$1,500	1.548	1.617
Tankless W/H	$ 2,000	1.549	1.102	$2,000	1.946	1.154	$2,000	1.860	1.294	$ 450	2.349	1.005	$2,000	1.658	1.044	$2,000	1.828	1.448	$2,000	1.773	1.390
Retrofit:																					
Tank W/H	$ 2,000	1.403	1.167	$2,000	1.794	1.254	$2,000	1.709	1.413	$ 400	2.257	1.039	$2,000	1.513	1.108	$2,000	1.403	1.489	$2,000	1.581	1.512
Tankless W/H	$ 2,500	1.585	1.045	$2,500	1.991	1.070	$2,500	1.903	1.195	$ 450	2.374	1.007	$2,500	1.681	1.009	$2,500	1.843	1.410	$2,500	1.773	1.287
Retention:																					
Tank W/H	$ 1,500	1.386	1.279	$1,500	1.608	1.613	$1,500	1.692	1.611	$ 400	2.263	1.098	$1,500	1.509	1.228	$1,500	1.393	1.557	$1,500	1.558	1.701
Tankless W/H	$ 2,000	1.566	1.150	$2,000	1.972	1.209	$2,000	1.885	1.364	$ 450	1.846	1.583	$2,000	1.695	1.097	$2,000	1.830	1.481	$2,000	1.746	1.451

ATTACHMENT A

Gas Utility Appliance Cost-Effectiveness Results

Large Food Service Program	Cntrl FL Gas			FL City Gas			FPUC			Indiantown			Peoples			St. Joe			Sebring Gas		
New Construction:	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test
Tank W/H	$ 1,500	1.314	1.290	$1,500	1.712	1.571	$1,500	1.638	1.753	$1,000	2.449	1.055	$1,500	1.422	1.271	$1,500	1.451	1.556	$1,500	1.578	1.736
Tankless W/H	$ 2,000	1.628	1.255	$2,000	2.109	1.503	$2,000	2.020	1.673	$1,500	2.740	1.008	$2,000	1.757	1.234	$2,000	1.794	1.501	$2,000	1.949	1.660
Range/Oven	$ 1,500	1.681	1.234	$1,500	2.153	1.463	$1,500	2.066	1.625	$1,000	2.983	1.005	$1,500	1.805	1.211	$1,500	1.848	1.467	$1,500	1.999	1.616
Fryer	$ 3,000	1.085	1.107	$3,000	1.355	1.324	$3,000	1.298	1.462	$1,000	1.796	1.011	$3,000	1.130	1.131	$3,000	1.158	1.348	$3,000	1.255	1.460
Retrofit:																					
Tank W/H	$ 2,000	1.323	1.275	$2,000	1.723	1.541	$2,000	1.531	1.674	$1,000	2.449	1.055	$2,000	1.431	1.255	$2,000	1.460	1.532	$2,000	1.588	1.703
Tankless W/H	$ 2,500	1.639	1.236	$2,500	2.124	1.467	$2,500	2.034	1.631	$1,500	2.989	1.016	$2,500	1.769	1.214	$2,500	1.807	1.471	$2,500	1.962	1.620
Range/Oven	$ 1,500	1.681	1.234	$1,500	1.355	1.324	$1,500	2.066	1.625	$1,000	2.983	1.005	$1,500	1.805	1.211	$1,500	1.848	1.467	$1,500	1.999	1.616
Fryer	$ 3,000	1.085	1.107	$3,000	2.153	1.463	$3,000	1.298	1.462	$1,000	1.796	1.011	$3,000	1.130	1.131	$3,000	1.158	1.348	$3,000	1.255	1.460
Retention:																					
Tank W/H	$ 1,500	1.318	1.316	$1,500	1.718	1.618	$1,500	1.643	1.837	$1,000	2.451	1.097	$1,500	1.429	1.302	$1,500	1.452	1.583	$1,500	1.581	1.792
Tankless W/H	$ 2,000	1.634	1.279	$2,000	2.118	1.547	$2,000	2.029	1.749	$1,500	2.993	1.055	$2,000	1.769	1.263	$2,000	1.797	1.525	$2,000	1.954	1.712
Range/Oven	$ 1,500	1.691	1.257	$1,500	2.167	1.504	$1,500	2.080	1.697	$1,000	2.989	1.044	$1,500	1.825	1.240	$1,500	1.853	1.490	$1,500	2.007	1.664
Fryer	$ 3,000	1.091	1.125	$3,000	1.364	1.358	$3,000	1.308	1.520	$1,000	1.799	1.050	$3,000	1.143	1.155	$3,000	1.161	1.368	$3,000	1.260	1.500

ATTACHMENT A

Gas Utility Appliance Cost-Effectiveness Results

Large Hospitality Program	Cntrl FL Gas			FL City Gas			FPUC			Indiantown			Peoples			St. Joe			Sebring Gas		
New Construction:	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test
Tank W/H	$ 1,500	1.222	1.294	$1,500	1.588	1.600	$1,500	1.801	1.520	$1,000	2.268	1.070	$1,500	1.315	1.290	$1,500	1.343	1.578	$1,500	1.475	1.756
Tankless W/H	$ 2,000	1.564	1.270	$2,000	2.020	1.551	$2,000	1.937	1.740	$1,500	2.856	1.042	$2,000	1.680	1.265	$2,000	1.715	1.539	$2,000	1.881	1.703
Range/Oven	$ 1,500	1.671	1.223	$1,500	2.218	1.461	$1,500	2.025	1.705	$1,000	2.926	1.006	$1,500	1.783	1.212	$1,500	1.828	1.463	$1,500	1.992	1.602
Fryer	$ 3,000	1.079	1.097	$3,000	1.339	1.321	$3,000	1.285	1.465	$1,000	1.760	1.012	$3,000	1.115	1.214	$3,000	1.145	1.344	$3,000	1.251	1.446
Dryer	$ 1,500	1.012	1.291	$1,500	1.480	1.294	$1,500	1.434	1.435	$ 500	1.878	1.004	$1,500	1.257	1.117	$1,500	1.277	1.321	$1,500	1.387	1.417
Retrofit:																					
Tank W/H	$ 2,000	1.228	1.284	$2,000	1.595	1.580	$2,000	1.528	1.772	$1,000	2.268	1.070	$2,000	1.321	1.279	$2,000	1.349	1.561	$2,000	1.482	1.733
Tankless W/H	$ 2,500	1.571	1.257	$2,500	2.030	1.527	$2,500	1.947	1.709	$1,500	2.856	1.042	$2,500	1.688	1.251	$2,500	1.724	1.518	$2,500	1.890	1.674
Range/Oven	$ 1,500	1.671	1.223	$1,500	1.339	1.321	$1,500	2.046	1.631	$1,000	2.926	1.006	$1,500	1.783	1.214	$1,500	1.828	1.463	$1,500	1.992	1.602
Fryer	$ 3,000	1.079	1.097	$3,000	2.128	1.461	$3,000	1.285	1.465	$1,000	1.760	1.012	$3,000	1.115	1.133	$3,000	1.145	1.344	$3,000	1.251	1.446
Dryer	$ 1,500	1.176	1.131	$1,500	1.480	1.295	$1,500	1.434	1.435	$ 500	1.878	1.004	$1,500	1.257	1.117	$1,500	1.277	1.321	$1,500	1.387	1.417
Retention:																					
Tank W/H	$ 1,500	1.224	1.316	$1,500	1.592	1.633	$1,500	1.525	1.855	$1,000	2.269	1.098	$1,500	1.319	1.312	$1,500	1.344	1.596	$1,500	1.477	1.794
Tankless W/H	$ 2,000	1.568	1.291	$2,000	2.026	1.583	$2,000	1.943	1.794	$1,500	2.858	1.070	$2,000	1.687	1.285	$2,000	1.717	1.556	$2,000	1.884	1.739
Range/Oven	$ 1,500	1.681	1.242	$1,500	2.142	1.488	$1,500	2.039	1.756	$1,000	2.931	1.032	$1,500	1.802	1.233	$1,500	1.833	1.478	$1,500	2.001	1.633
Fryer	$ 3,000	1.085	1.112	$3,000	1.348	1.343	$3,000	1.294	1.503	$1,000	1.763	1.038	$3,000	1.128	1.149	$3,000	1.148	1.357	$3,000	1.256	1.472
Dryer	$ 1,500	1.176	1.147	$1,500	1.480	1.315	$1,500	1.434	1.459	$ 500	1.878	1.029	$1,500	1.257	1.132	$1,500	1.277	1.333	$1,500	1.387	1.442

ATTACHMENT A

Gas Utility Appliance Cost-Effectiveness Results

Large Cleaning Service Program	Cntrl FL Gas			FL City Gas			FPUC			Indiantown			Peoples			St. Joe			Sebring Gas		
New Construction:	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test	Rebate Amount	Prtcpnt Test	RIM Test
Tank W/H	$ 1,500	1.329	1.214	$1,500	1.622	1.531	$1,500	1.603	1.721	$1,000	2.363	1.039	$1,500	1.410	1.223	$1,500	1.357	1.573	$1,500	1.500	1.737
Tankless W/H	$ 2,000	1.754	1.185	$2,000	2.171	1.442	$2,000	2.095	1.614	$1,250	3.036	1.003	$2,000	1.848	1.175	$2,000	1.734	1.534	$2,000	1.965	1.636
Dryer	$ 1,500	1.076	1.144	$1,500	1.330	1.393	$1,500	1.286	1.555	$ 500	1.766	1.032	$1,500	1.142	1.147	$1,500	1.282	1.319	$1,500	1.205	1.580
Retrofit:																					
Tank W/H	$ 2,000	1.340	1.195	$2,000	1.676	1.492	$2,000	1.616	1.675	$1,000	2.361	1.039	$2,000	1.422	1.202	$2,000	1.364	1.556	$2,000	1.044	2.167
Tankless W/H	$ 2,500	1.761	1.146	$2,500	2.188	1.397	$2,500	2.112	1.560	$1,250	3.003	1.003	$2,500	1.864	1.149	$2,500	1.742	1.515	$2,500	1.980	1.579
Dryer	$ 1,500	1.074	1.144	$1,500	1.329	1.393	$1,500	1.284	1.556	$ 500	1.763	1.032	$1,500	1.141	1.147	$1,500	1.282	1.319	$1,500	1.204	1.580
Retention:																					
Tank W/H	$ 1,500	1.328	1.215	$1,500	1.668	1.558	$1,500	1.609	1.752	$1,000	2.364	1.055	$1,500	1.420	1.238	$1,500	1.358	1.577	$1,500	1.503	1.770
Tankless W/H	$ 2,000	1.754	1.185	$2,000	2.181	1.466	$2,000	2.106	1.641	$1,250	3.037	1.018	$2,000	1.865	1.188	$2,000	1.736	1.538	$2,000	1.970	1.665
Dryer	$ 1,500	1.074	1.158	$1,500	1.329	1.415	$1,500	1.284	1.580	$ 500	1.763	1.047	$1,500	1.141	1.160	$1,500	1.282	1.327	$1,500	1.204	1.607