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:	May 26, 2023
TO:	Adam Teitzman, Commission Clerk, Office of Commission Clerk
FROM:	Greg Davis, Engineering Specialist, Division of Engineering GD LK Phillip Ellis, Public Utilities Supervisor, Division of Engineering
RE:	Docket No. 20230000-OT - Undocketed filings for 2023.

Please file in the above mentioned docket file the attached document, Staff's Data Request #2, which was sent via email to each of the Ten-Year Site Plan utilities listed below:

Duke Energy Florida, Inc.
Florida Municipal Power Agency
Florida Power & Light Company
Gainesville Regional Utilities
JEA
Lakeland Electric
Orlando Utilities Commission
Seminole Electric Cooperative
City of Tallahassee
Tampa Electric Company

GD/POE/pz

Attachment

May 26, 2023

Dear Utility Representatives,

This year's Ten-Year Site Plan Review process (TYSP Review) is being led by Greg Davis and Phillip Ellis in the Florida Public Service Commission's (FPSC) Division of Engineering. Contact information is as follows:

Greg Davis
Office: (850) 413-6582
Email: GDavis@psc.state.fl.us

and

Phillip Ellis
Office: (850) 413-6626
Email: PEllis@psc.state.fl.us

Attached is Staff's Data Request #2. Please submit your responses to this data request to both the FPSC Division of Engineering and the FPSC Office of Commission Clerk by following the instructions below:

Submission to the FPSC Division of Engineering

Please email your responses to questions to Greg and Phillip by **Friday, June 16, 2023**. Please submit all **narrative** responses following their respective questions in a **single Microsoft Word** document, making sure to preserve question order.

Submission to the FPSC Office of Commission Clerk

1. Please convert the narrative responses sent to the FPSC Division of Engineering into a single PDF document.

2. Please electronically file this PDF document via the Commission's website no later than **Friday, June 16, 2023**.
    a. Navigate to www.floridapsc.com.
    b. At the top of the page, hover the mouse cursor over the "Clerk's Office" tab.
    c. Select from the drop-down menu "Electronic Filing Web Form."
    d. Please complete the form, referencing "Docket No. 20230000-OT."
    e. Attach to the form the PDF created in Step 1 as the "Primary PDF."
    f. Submit the form.

If you have any questions, please contact Greg Davis and Phillip Ellis.

Sincerely,
Patti Zellner
Administrative Assistant

Division of Engineering
Phone: (850) 413-6208
Email: **pzellner@psc.state.fl.us**

Enclosure

cc: Office of Commission Clerk (20230000-OT – Undocketed filings for 2023)

1. Please refer to DEF's 2023 Ten-Year Site Plan (TYSP), Schedules 2.1.1 and 2.2.1 "History and Forecast of Energy Consumption and Number of Customers By Customer Class (Base Case Forecast)" for the questions below:

   a. Please explain why the Company projected that the amount of "Average KWh Consumption Per Customer" for 2023 will be lower than both of the 2022 actual amount and the 2024 projected amount for each of the "Rural And Residential" and "Industrial" classes.

   b. Please explain why the Company projected that the amount of "Total Sales to Ultimate Consumers (GWh)" for 2023 will be lower than the 2022 actual amount.

2. Referring to DEF's 2023 TYSP, Schedules 2.1.1 and 2.2.1, please explain how DEF derived its forecasted "Average KWH Consumption Per Customer" for each of the Rural & Residential, Commercial and Industrial Classes.

3. If Schedules 2.1 and 2.2 do not include the incremental impact of utility conservation programs on forecasted "GWh" or "Average KWh Consumption per Customer" for each of the Rural & Residential, Commercial, and Industrial Classes, please explain DEF's rationale for not including such impacts. Also, explain what impact the exclusion of such conservation has on the various forecasts appearing in these schedules.

1. Referring to FMPA's 2023 Ten-Year Site Plan (TYSP), Schedules 2.1 and 2.2, please explain how FMPA derived its forecasted "Average kWh Consumption Per Customer" for each of the Residential, Commercial and Industrial Classes.

2. If Schedules 2.1 and 2.2 do not include the incremental impact of utility conservation programs on forecasted "GWh" or "Average kWh Consumption per Customer" for each of the Rural & Residential, Commercial, and Industrial Classes, please explain FMPA's rationale for not including such impacts. Also, explain what impact the exclusion of such conservation has on the various forecasts appearing in these schedules.

3. Please refer to FMPA's 2023 TYSP, Schedule 2.2 "History and Forecast of Energy Consumption and Number of Customers By Customer Class" for the questions below:

    a. Please explain why FMPA projected that, starting from 2023, the "Average kWh Consumption per Customer" of industrial class will be reduced significantly compared with the actual amount experienced in 2022 and 2021.

    b. In its 2023 TYSP, page 3-9, Schedule 2.2, FMPA indicated that the "Total Sales to Ultimate Customers" in 2021 is 5,904 GWh. However, in its 2022 TYSP, pages 3-10, Schedule 2.2, FMPA indicated that the "Total Sales to Ultimate Customers" in 2021 is 5,944 GWh. Please explain the difference and provide a revised filing, if necessary.

Please refer to filings regarding FPL's Ten-Year Site Plans.

1. Referring to FPL's response to Staff's First Data Request, No. 2, Attachment No.1, Tab. 7 of 23 (Schedule 2.2), please explain why FPL projected that the amount of "Sales to Ultimate Consumers (GWh)" for 2023 will be lower than both the 2022 actual amount and the 2024 projected amount.

2. Referring to FPL's response to Staff's First Data Request, No. 2, Attachment No.1, Tab. 7 of 23 (Schedules 2.1 and 2.2), please explain how FPL derived its forecasted "Average kWh Consumption Per Customer" for each of the Rural & Residential, Commercial, and Industrial Classes.

3. If Schedules 2.1 and 2.2 do not include the incremental impact of utility conservation programs on forecasted "GWh" for each of the Rural & Residential, Commercial, and Industrial Classes, please explain FPL's rationale for not including such impacts. Also, explain what impact the exclusion of such conservation has on the various forecasts appearing in these schedules.

4. Please refer to FPL's response to Staff's First Data Request, No. 2, Attachment 1, Tab Schedule 3.1 for both the 2022 and 2023 Ten-Year Site Plans. Please explain why the sum of the historical summer peak totals for FPL and Gulf (Column 2) in FPL's 2022 Ten-Year Site Plan do not match the historical summer peak totals (Column 2) depicted in FPL's 2023 Ten-Year Site Plan.

Table 1: Differences in FPL's 2022-23 Historical Summer Peak Demand Values

2022 TYSP FPL Total		2022 TYSP Gulf Total		2022 TYSP FPL + Gulf		2023 TYSP FPL		Difference
2012	21,440	2012	2,351	2012	23,791	-	-	-
2013	21,576	2013	2,362	2013	23,938	2013	23,556	(382)
2014	22,935	2014	2,437	2014	25,372	2014	23,606	(1,766)
2015	22,959	2015	2,495	2015	25,454	2015	25,117	(337)
2016	23,858	2016	2,508	2016	26,366	2016	25,361	(1,005)
2017	23,373	2017	2,434	2017	25,807	2017	26,044	237
2018	23,217	2018	2,491	2018	25,708	2018	25,662	(46)
2019	24,241	2019	2,472	2019	26,713	2019	25,411	(1,302)
2020	24,499	2020	2,410	2020	26,909	2020	26,594	(315)
2021	24,042	2021	2,441	2021	26,483	2021	26,336	(147)

1. Referring to GRU's 2023 Ten-Year Site Plan (TYSP), Schedules 2.1 and 2.2 "History and Forecast of Energy Consumption and Number of Customers By Customer Class," please explain how GRU derived its forecasted "Average kWh per Customer" for the Residential and Commercial Classes; and the forecasted "Average MWh per Customer" for the Industrial Class.

2. If Schedules 2.1 and 2.2 do not include the incremental utility conservation programs on forecasted "GWh" or "Average kWh Consumption per Customer" for each of the Rural & Residential, Commercial, and Industrial Classes, please explain GRU's rationale for not including such impacts. Also, explain what impact the exclusion of such conservation has on the various forecasts appearing in these schedules.

3. Please refer to GRU's 2023 TYSP, Schedules 2.1 and 2.2 "History and Forecast of Energy Consumption and Number of Customers By Customer Class." It appears that the Utility expected that the average energy consumption per customer" of each residential, commercial and industrial classes will experience a notable change in 2023 as show in Table 1 below. Please identify the specific cause(s) or reason(s) behind these changes.

Table 1: Reduction in Average Energy Consumption per Customer

	Industrial	Commercial	Residential
Year	MWh	kWh	kWh
2023	15,909	67,129	9,296
2022	16,273	67,499	9,359
Reduced Amount	-364	-370	-63
%	-2.3%	-0.6%	-0.7%

Source: GRU's 2023 TYSP, Schedules 2.1 and 2.2

Please refer to filings regarding JEA's Ten-Year Site Plans.

1. Please refer to Schedule 2.2: History and Forecast of Energy Consumption and Number of Customers By Class provided in JEA's 2023 Ten-Year Site Plan (TYSP), 2022 TYSP, 2022 TYSP-Revised and 2021 TYSP-Revised. It appears that there are reporting differences in total sales among these filings as shown in Table 1 below. Please provide an explanation for the reporting differences with the necessary revisions, if any.

Table 1: Differences in JEA's Reported Total Sales					
Schedule 2.2: History and Forecast of Energy Consumption and Number of Customers By Class					
Year	2023 TYSP Filed 4/1/2023 Total Sales to Ultimate Customers	2022 TYSP Filed 4/1/2022 Total Sales to Ultimate Customers	2022 TYSP - Revised Filed 4/12/2022 Total Sales to Ultimate Customers	2021 TYSP - Revised Filed 7/15/2022 Total Sales to Ultimate Customers	Difference
	GWH	GWH	GWH	GWH	GWH
	(1)	(2)	(3)	(4)	(5) = (1) - (4)
2021				11,968	
2012		11,663	11,663	11,452	
2013	11,556	11,556	11,556	11,340	216
2014	11,934	11,934	11,934	11,713	221
2015	12,091	12,091	12,091	11,864	227
2016	12,184	12,184	12,184	11,949	235
2017	12,050	12,050	12,050	11,805	245
2018	12,326	12,326	12,326	12,085	241
2019	12,328	12,328	12,328	12,328	
2020	12,319	12,319	12,319	12,319	
2021	12,066	12,066	12,066		
2022	12,491				

2. Referring to JEA's 2023 TYSP, Schedules 2.1 and 2.2, please explain how JEA derived its forecasted "Average kWh/Customer" for each of the Rural & Residential, Commercial and Industrial Classes.

3. If Schedules 2.1 and 2.2 do not include the incremental impact of utility conservation programs on forecasted "GWh" or "Average kWh Consumption per Customer" for each of the Rural & Residential, Commercial, and Industrial Classes, please explain JEA's rationale for not including such impacts. Also, explain what impact the exclusion of such conservation has on the various forecasts appearing in these schedules.

4. Please refer to JEA's response to Staff's First Data Request, No. 2, Attachment 1, Tab Schedule 3 for both the 2022 and 2023 Ten-Year Site Plans for the following question. Please provide the correct values and an explanation for each of the discrepancies in the Table 2 below.

Table 2: Differences in JEA's Reported Winter Demand Values			
Year	2022 TYSP Total & Net Firm	2023 TYSP Total & Net Firm	Difference
2016-17	2,635	2,433	(202)
2017-18	3,007	3,011	4

Please refer to filings regarding LAK's Ten-Year Site Plans.

1. Referring to LAK's 2023 Ten-Year Site Plan (TYSP), Schedules 2.1 and 2.2, please explain how LAK derived its forecasted "Average kWh Consumption Per Customer" for each of the Rural & Residential, Commercial and Industrial Classes.

2. If Schedules 2.1 and 2.2 do not include the incremental impact of utility conservation programs on forecasted "GWh" or "Average kWh Consumption per Customer" for each of the Rural & Residential, Commercial, and Industrial Classes, please explain LAK's rationale for not including such impacts. Also, explain what impact the exclusion of such conservation has on the various forecasts appearing in these schedules.

3. Referring to LAK's 2023 TYSP, Schedules 2.1, 2.2 and 2.3, please explain the reporting differences in the "Total No. of Customers" as shown in Table 1 below, and provide the necessary revisions, if any.

Table 1: Differences in LAK's Reported Total No. of Customers

	LAK Reported*					Staff Calculated	Difference
Year	Schedule 2.1 Rural & Residential Average No. of Customers	Schedule 2.1 Commercial Average No. of Customers	Schedule 2.2 Industrial Average No. of Customers	Schedule 2.3 Other Customers Average No.	Schedule 2.3 Total No. of Customers	Total No. of Customers	Total No. of Customers
	(1)	(2)	(3)	(4)	(5)	(6)=(1)+(2)+(3)+(4)	(7) = (6) - (5)
2013	101968	11864	79	8,820	122,803	122,731	-72
2014	103099	12,022	77	8,860	124,019	124,058	39
2015	104,581	12,157	76	8,921	125,674	125,735	62
2016	105,932	12,225	74	8,966	127,152	127,197	45
2017	107,703	12,372	72	8,997	129,113	129,144	31
2018	109,043	12,543	74	9,051	130,658	130,711	53
2019	110,403	12,687	76	9,051	132,217	132,217	-
2020	112,175	12,889	75	9,182	134,320	134,321	1
2021	114,683	13,219	71	9,189	137,162	137,162	-
2022	116,907	13,452	76	9,200	139,635	139,635	-

*Source: LAK's 2023 TYSP, Schedules 2.1 - 2.3: History and Forecast of Energy Consumption and Number of Customers By Class

4. Referring to LAK's 2022 and 2923 TYSPs, Schedules 2.3, please explain the reporting differences in the "Other Customers (Average No.)" as shown in Table 2 below, and provide the necessary revisions, if any.

Table 2: Differences in LAK's Reported Other Customers (Average No.)

Year	LAK's 2023 TYSP, Schedule 2.3 Other Customers (Average No.)	LAK's 2022 TYSP, Schedule 2.3 Other Customers (Average No.)	Difference
	(1)	(2)	(3) = (1) -(2)
2012		8,953	
2013	8,820	8,892	-72
2014	8,860	8,820	40
2015	8,921	8,860	62
2016	8,966	8,921	45
2017	8,997	8,966	31
2018	9,051	8,997	54
2019	9,051	9,051	-
2020	9,182	9,182	-
2021	9,189	9,189	-
2022	9,200		

1. Referring to OUC's 2023 Ten-Year Site Plan (TYSP), Schedules 2.1 and 2.2, please explain how OUC derived its forecasted "Average KWH Consumption Per Customer" for each of the Rural & Residential, Commercial and Industrial Classes.

2. If Schedules 2.1 and 2.2 do not include the incremental impact of utility conservation programs on forecasted "GWh" or "Average kWh Consumption per Customer" for each of the Rural & Residential, Commercial, and Industrial Classes, please explain OUC's rationale for not including such impacts. Also, explain what impact the exclusion of such conservation has on the various forecasts appearing in these schedules.

3. Please refer to OUC's 2023 TYSP, Schedules 2.1 and 2.2 "History and Forecast of Energy Consumption and Number of Customers By Customer Class" for the questions below:

   a. Please explain how the forecasted amounts of the "Average KWH Consumption Per Customer" were derived for each of the residential, commercial and industrial classes.

   b. As show in Table 1 below, OUC projected that the "Average KWH Consumption Per Customer" will be lower than both the actual amount experienced in 2022 and the projected amounts for 2024 and 2025 for each of the residential, commercial and industrial classes. Please explain the specific cause(s) or reason(s) behind this projected reduction.

Table 1: Average Energy Consumption per Customer

	Residential	Commercial	Industrial
Year	KWh	KWh	KWh
2022	11,851	17,285	697,124
2023	10,971	16,797	691,488
2024	11,067	16,866	695,799
2025	10,988	16,834	705,088

Source: OUC's 2023 TYSP, Schedules 2.1 and 2.2

1. Referring to SEC's 2023 Ten-Year Site Plan, Schedules 2.1 and 2.2, "History and Forecast of Energy Consumption and Number of Customers By Customer Class," please explain how OUC derived its forecasted "Average KWH Consumption Per Customer" for each of the Rural and Residential, Commercial and Industrial Classes.

2. If Schedules 2.1 and 2.2 do not include the incremental impact of utility conservation programs on forecasted "GWh" or "Average kWh Consumption per Customer" for each of the Rural & Residential, Commercial, and Industrial Classes, please explain OUC's rationale for not including such impacts. Also, explain what impact the exclusion of such conservation has on the various forecasts appearing in these schedules.

3. Please refer to SEC's response to Staff's First Data Request, No. 2, Attachment 1, Tab 3.1 for both the 2022 and 2023 Ten-Year Site Plans for the following question. Please provide the correct values and an explanation for each of the discrepancies in the Table 1 below.

Table 1: Differences in SEC's 2021-22 Winter Peak Demand Values

	2022 TYSP	2023 TYSP	Difference
Total	2,442	3,982	1,540
Res LM	42	55	13
C&I LM	8	12	4
Net Firm	2,392	3,915	1,523

4. Please refer to SEC's response to Staff's First Data Request. No. 2, Attachment 1, Tab 3.1 for both the 2022 and 2023 Ten-Year Site Plans. Please provide the correct values and an explanation for each of the discrepancies in the Table 2 below.

Table 2: Differences in SEC's 2022-23 Summer Peak Demand Values

	2022 TYSP	2023 TYSP	Difference
Total	3,494	3,496	2
Wholesale	3,494	3,496	2
C&I LM	9	11	2

1. Please refer to TAL's 2023 Ten-Year Site Plan, Schedules 2.1 and 2.2 "History and Forecast of Energy Consumption and Number of Customers By Customer Class" for the questions below:

   a. Please explain how TAL derived its forecasted "Average kWH Consumption Per Customer" for each of the Rural & Residential and Commercial Classes.

   b. It appears that for the Rural & Residential Class, TAL projected that the 2023 "Average kWh Consumption Per Customer" will be higher than the actual amount experienced each year during 2020 - 2022 and the projected amounts for each year in 2024-2032. Please explain the specific cause(s) or reason(s) behind.

2. If Schedules 2.1 and 2.2 do not include the incremental impact of utility conservation programs on forecasted "GWh" or "Average kWh Consumption per Customer" for each of the Rural & Residential, Commercial, and Industrial Classes, please explain OUC's rationale for not including such impacts. Also, explain what impact the exclusion of such conservation has on the various forecasts appearing in these schedules.

3. Please refer to TAL's response to Staff's First Data Request, No. 2, Attachment 1, Tab Tbl 2.10 (Sch 3.3.1) for both the 2022 and 2023 Ten-Year Site Plans for the following question. Please provide the correct values and an explanation for each of the discrepancies in the tables below.

Table 1: Differences in TAL's Total Winter Peak Demand

Year	2022 TYSP	2023 TYSP	Difference
2013	2,558	2,631	73
2014	2,637	2,677	40
2015	2,655	2,623	(31)
2016	2,640	2,612	(27)
2017	2,617	2,666	49
2018	2,675	2,698	23
2019	2,716	2,618	(98)
2020	2,584	2,588	4
2021	2,570	2,629	59

Table 2: Differences in TAL's UU & Loss Winter Peak Demand			
Year	2022 TYSP	2023 TYSP	Difference
2013	131	145	14
2014	121	121	0
2015	120	112	(7)
2016	135	144	8
2017	124	126	2
2018	126	126	(0)
2019	112	129	17
2020	121	79	(41)
2021	115	117	2

Table 3: Differences in TAL's NEL Winter Peak Demand			
Year	2022 TYSP	2023 TYSP	Difference
2013	2,684	2,682	(2)
2014	2,751	2,745	(6)
2015	2,776	2,788	13
2016	2,779	2,770	(8)
2017	2,758	2,751	(8)
2018	2,824	2,815	(9)
2019	2,851	2,848	(3)
2020	2,728	2,724	(4)
2021	2,705	2,730	25

Table 4: Differences in TAL's Res EE Winter Peak Demand			
Year	2022 TYSP	2023 TYSP	Difference
2021	4	0	(4)

1. Referring to TECO's 2023 Ten-Year Site Plan (TYSP), Schedules 2.1 and 2.2, please explain how TECO derived its forecasted "Average KWH Consumption Per Customer" for each of the Rural And Residential, Commercial and Industrial Classes.

2. If Schedules 2.1 and 2.2 do not include the incremental impact of utility conservation programs on forecasted "GWh" or "Average kWh Consumption per Customer" for each of the Rural & Residential, Commercial, and Industrial Classes, please explain TECO's rationale for not including such impacts. Also, explain what impact the exclusion of such conservation has on the various forecasts appearing in these schedules.

3. Please refer to TECO's 2023 TYSP, Schedules 2.1 and 2.2 "History and Forecast of Energy Consumption and Number of Customers By Customer Class (Base Case)" for the questions below:

    a. Please explain why the Company projected that the amount of GWH sales to Rural and Residential Class for 2023 will be lower than both the 2022 actual amount and the 2024 projected amount.

    b. Please explain why the Company projected that the amount of Commercial Class "Average KWh Consumption Per Customer" for 2023 will be lower than both of the 2022 actual amount and the 2024 projected amount.

    c. Please explain why the Company projected that the amount of "Total Sales to Ultimate Consumers (GWh)" in 2023 will be lower than both the actual amount in 2022 and the projected amount in 2024