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Public Service Commission

April 17, 2024

Mr. J. Jeffry Wahlen, Esq.
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Tallahassee, FL 32302
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**STAFF'S FIRST DATA REQUEST
VIA EMAIL**

Re: Docket No. 20240018-EG – Commission review of numeric conservation goals (Peoples Gas System, Inc.)

Dear Mr. Wahlen:

Please respond to the following questions regarding Peoples Gas System, Inc.'s (Peoples or Utility) petition in the above referenced docket by **Friday, May 17, 2024**.

1. Please refer to witness Morgan's direct testimony, page 5, lines 12 through 19. Please provide a copy of the study discussed regarding residential customer gas appliance adoption rates. As part of the response, for those items or inserts produced using Microsoft Excel, include the file with links and formulas intact
2. Please refer to witness Morgan's direct testimony, Exhibit CTM-1, Document Nos. 1 through 6. Please provide an electronic copy of each document in its native format, and for those items or inserts produced using Microsoft Excel, include the file with links and formulas intact.
3. Please refer to witness Morgan's direct testimony, Exhibit CTM-1, Document No. 4. Please provide all documents the witness used to support the calculations for all data on PSC C.B. Forms 1, 2, 3, 4, and 5. As part of this response, please answer the following questions:
 - a. For each program, provide the assumptions for the mix of appliances installed used to generate the average per participant values presented in C.B. Form 1. Explain how this appliance mix was determined, and provide the relevant values for each appliance (savings, rebate, etc.).

- b. Verify that the number of appliances installed and the participants are the same for each program. As part of this response, explain whether each appliance is considered a participant, or if a single participant can install multiple appliances.
 - c. For each C.B. Form, 1 through 5, explain how the data was derived, including any assumptions for each of the column headings on Forms 2, 3, 4, and 5, and row headings on Form 1.
4. Please provide a table comparing the Utility's proposed DSM Programs to both its existing programs original estimates and actual observed values, showing the total number of participants per year, average therm savings per participant, and total therm savings per year.
 - a. Verify whether the proposed DSM goals are based solely on therms above baseline standard efficiencies. If not, explain why not and provide a goals value solely based on therms above baseline efficiency.
 - b. Discuss whether customers can participate and receive a rebate with a baseline efficiency unit. If so, provide an estimate for each proposed program of what percentage of customers receiving a rebate are anticipated to be getting a baseline efficiency unit versus one above baseline efficiency, and explain how the utility developed that estimate.
5. Please verify that the second set of rebates/admin costs is due to the 20 year analysis period, pursuant to Rule 25-17.009, Florida Administrative Code, compared to a shorter than 20 year appliance life. If so, provide the estimated appliance life for each appliance included in the Utility's proposed DSM programs. If not, explain the reason for the second set of rebates/admin costs.
6. Refer to Witness Morgan's Exhibit No. CTM-1, Document No. 2, page 1 of 2.
 - a. Please explain why residential technical potential has increased from 58.6 million therms in the previous DSM goal period of 2019-2028 to 114.0 million therms in current the DSM goal period of 2025-2034.
 - b. Please explain why industrial technical potential has decreased from 245.8 million therms in the previous DSM goal period of 2019-2028 to 22.4 million terms in the in current the DSM goal period 2025-2034. As part of this response, detail the industrial process category and its impact on the total decrease.
7. Please discuss how measure development and therm savings analysis account for measure implementation in different dwellings (e.g. single-family, multi-family, and mobile homes). Please provide any supporting technical analysis in Microsoft Excel format, with formulas intact.

Mr. J. Jeffry Wahlen

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Please file all responses electronically via the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20240018-EG) and also please email the filed response to discovery-gcl@psc.state.fl.us. If you have any questions, please contact Greg Davis by phone at (850) 413-6582 or email at gdavis@psc.state.fl.us.

Sincerely,

s/Greg Davis

Greg Davis
Engineering Specialist
Bureau of Reliability and Resource Planning
Division of Engineering

PGD:da

cc: Office of Commission Clerk (Docket No. 20240018-EG)
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