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August 6, 2024

**VIA ELECTRONIC FILING**

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

**Re: Docket No. 20240017-EG – In re: Commission Review of  
Numeric Conservation Goals for Orlando Utilities Commission  
Stipulations of OUC, Florida Rising and SACE**

Dear Mr. Teitzman:

Enclosed for filing are stipulations among Orlando Utilities Commission, Florida Rising, Inc. and Southern Alliance for Clean Energy. Upon approval by the Florida Public Service Commission, the attached stipulations will fully resolve the Parties' respective issues in the above-referenced docket.

If you or your staff have any questions regarding this filing, please contact me at (850) 933-2016.

Respectfully submitted,

Robert Scheffel Wright

Enclosure  
cc: Certificate of Service

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail this 6th day of August, 2024, to the following:

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*/s/ Robert Scheffel Wright*

ATTORNEY

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Commission Review of Numeric         )  
Conservation Goals for                         )  
Orlando Utilities Commission                 )         DOCKET NO. 20240017-EG  
\_\_\_\_\_)         Filed: August 6, 2024

**STIPULATIONS**

Orlando Utilities Commission (“OUC”), Florida Rising, Inc. (“Florida Rising”), and the Southern Alliance for Clean Energy, Inc. (“SACE”) (hereinafter referred to individually as “Party” or collectively as “Parties”), hereby agree to submit for approval by the Florida Public Service Commission (“Commission”) the following stipulations to fully resolve the Parties’ respective issues in Docket No. 20240017-EG (the “OUC Goals Docket”) on the following terms and conditions:

1. The Parties stipulate to having all pre-filed testimony and exhibits filed in this docket entered into the record, specifically the following:
  - a. The Direct Testimony of OUC witness Jim Herndon, along with Exhibits JH-1 through JH-16;
  - b. The Direct Testimony of OUC witness Kevin M. Noonan, along with Exhibits KMN-1 through KMN-5;
  - c. The Direct Testimony of OUC witness Bradley E. Kushner, along with Exhibits BEK-1 through BEK-3;
  - d. The Rebuttal Testimony of OUC witness Kevin M. Noonan, along with Exhibit KMN-6; and
  - e. The Direct Testimony of Florida Rising witness MacKenzie Marcelin, along with Exhibits MM-1 through MM-14, MM-19, MM-24 through MM-25, and MM-35.

2. The Parties agree to waive cross-examination of all witnesses in Docket No. 20240017-EG and, upon Commission approval, have no objection to all of the above-named witnesses being excused from appearing at the hearing.
3. The Parties stipulate to having the following exhibits identified on Staff's Comprehensive Exhibit List entered into the record for Docket No. 20240017-EG: 74-87, 88-101, 106, 111-112, 122, 148, 214-222, 223-224, 714-747, 767, 772, and 783.
4. The Parties stipulate and agree that OUC's proposed DSM Goals for the ten-year period of 2025-2034 shall be modified as follows:
  - a. The annual megawatt-hour (MWH) goal for OUC's proposed Residential Efficiency Delivered program for 2025 shall be 110 MWH, and the annual goal shall be increased by 5 MWH per year each year thereafter through 2034, such that the goal in 2034 shall be 155 MWH, and OUC's Residential sector and total summer peak demand and winter peak demand reduction goals shall be increased correspondingly, with OUC's new MWH and peak demand MW goals being as shown in the stipulated position on Issue 12 below; provided, however, the Parties agree that OUC's DSM Goals associated participation levels shall be reassessed and reset in the next DSM Goals docket to be filed in 2029.
  - b. Additionally, to enhance OUC's energy conservation outreach efforts to OUC's low-income customers, OUC will commit to distribute 1,000 Energy Efficiency Kits per year to low-income-customers through appropriate marketing channels, neighborhood association meetings, partnering low-income service agencies, and related means. These Kits will be over and above the Energy Efficiency Kits that OUC already distributes to customers with its Residential Energy Surveys (energy audits). Each Kit distributed pursuant to this low-income customer initiative will include four (4) 9-watt (9W) LED light bulbs, 17 feet of weather-stripping, and two LED night-lights. (For clarity, OUC will continue to distribute its remaining inventory of Kits that contain 2 9W LED bulbs to customers receiving a Home Energy Survey, until that inventory is exhausted, after which all Energy Efficiency Kits, both those distributed through this low-income initiative and those distributed through OUC's Home Energy Surveys, will contain 4 9W LED bulbs.) This Energy Efficiency Kits measure is a behavioral measure that will not be reflected in changes to OUC's numeric MWH and MW goals, but the numeric participation goal is part of the stipulation that the Parties ask the PSC to approve as part of its order

approving OUC's Energy Conservation Goals in the Goals Docket. Any Party to these Stipulations may propose changes to this behavioral measure and participation goal in OUC's next (2029) Energy Conservation Goals Docket.

- c. The programs included in OUC's DSM portfolio will not be capped or discontinued if the sector-level goals are achieved.
5. The Parties stipulate and agree that the modifications and addition set forth in Paragraph 4 above are a reasonable compromise of competing positions set forth in the testimony and exhibits submitted by the OUC and Florida Rising witnesses.
  6. Subject to the modifications of OUC's proposed DSM goals as set forth in Paragraph 4 above, the Parties stipulate to the following positions on each of the Issues set forth in the Prehearing Order:

Issue 1: The Parties stipulate and agree that the record supports a Commission finding that OUC's proposed DSM Goals, as modified herein, are based on an adequate assessment of the full technical potential of all available demand-side and supply-side conservation and efficiency measures, including demand-side renewable energy systems.

Issue 2: The Parties stipulate and agree that the record supports a Commission finding that OUC's proposed DSM Goals, as modified herein, are based on savings reasonably achievable through demand-side management programs over a ten-year period.

Issue 3: The Parties stipulate and agree that the record supports a Commission finding that OUC's proposed DSM Goals, as modified herein, adequately reflect the costs and benefits to customers participating.

Issue 4: The Parties stipulate and agree that the record supports a Commission finding that OUC's proposed DSM Goals, as modified herein, adequately reflect the costs and benefits to the general body of rate payers as a whole, including utility incentives and participant contributions.

Issue 5: The Parties stipulate and agree that the record supports a Commission finding that OUC's proposed DSM Goals, as modified herein, adequately reflect the need for incentives to promote both customer-owned and utility-owned energy efficiency and demand side renewable energy systems.

Issue 6: The Parties stipulate and agree that the record supports a Commission finding that OUC's proposed DSM Goals, as modified herein, adequately

reflect the costs imposed by state and federal regulations on the emissions of greenhouse gases.

Issue 7: The Parties stipulate and agree that the record supports a Commission finding that OUC’s proposed DSM Goals, as modified herein, appropriately reflect consideration of free riders.

Issue 8a: **Not an issue in OUC’s Docket No. 20240017-EG.**

Issue 8b: **Not an issue in OUC’s Docket No. 20240017-EG.**

Issue 9: **Not an issue in OUC’s Docket No. 20240017-EG.**

Issue 10: **Not an issue in OUC’s Docket No. 20240017-EG.**

Issue 11: **Not an issue in OUC’s Docket No. 20240017-EG.**

Issue 12: The Parties stipulate and agree that to reflect the modifications agreed to in Paragraph 4 above, OUC’s proposed numeric DSM Goals for annual energy (MWH) savings and summer and winter peak MW reductions shall be as shown in the following table for the period 2025 through 2034.

Orlando Utilities Commission - Proposed Numeric Demand and Energy Goals (2025 - 2034) <sup>1</sup>									
Year	Residential			Commercial / Industrial			Total		
	Summer Peak Demand Reduction (MW)	Winter Peak Demand Reduction (MW)	Annual Energy Reduction (MWH)	Summer Peak Demand Reduction (MW)	Winter Peak Demand Reduction (MW)	Annual Energy Reduction (MWH)	Summer Peak Demand Reduction (MW)	Winter Peak Demand Reduction (MW)	Annual Energy Reduction (MWH)
2025	0.111	0.181	1,072	0.485	0.380	3,207	0.597	0.561	4,279
2026	0.113	0.192	1,129	0.534	0.411	3,508	0.646	0.604	4,638
2027	0.114	0.203	1,186	0.577	0.438	3,769	0.691	0.641	4,955
2028	0.116	0.214	1,243	0.620	0.463	4,019	0.736	0.677	5,262
2029	0.118	0.225	1,301	0.661	0.485	4,247	0.779	0.711	5,548
2030	0.121	0.236	1,357	0.697	0.505	4,446	0.817	0.741	5,803
2031	0.124	0.247	1,419	0.726	0.520	4,605	0.850	0.767	6,024
2032	0.128	0.260	1,489	0.746	0.529	4,715	0.874	0.789	6,204
2033	0.133	0.275	1,569	0.755	0.532	4,770	0.888	0.807	6,339
2034	0.139	0.291	1,659	0.754	0.529	4,767	0.893	0.820	6,425

<sup>1</sup> Totals may not add due to rounding.

Issue 13: The Parties stipulate and agree that the record supports a Commission finding that no additional goals should be established for demand-side renewable energy systems.

Issue 14: The Parties stipulate and agree that approval of the stipulations set forth herein will fully resolve the issues and positions of all Parties to this docket


and, therefore, this docket should be closed upon the issuance of an Order approving these stipulations.

7. The Parties stipulate and agree that OUC's proposed DSM Goals, as modified herein, deliver meaningful energy-efficiency savings options to all customers including owners, renters, and low-income customers, and should be approved.
8. The Parties stipulate and agree that OUC's proposed DSM Goals, as modified herein, constitute a reasonable approach to meet the requirements of Section 366.82, Florida Statutes, and Rules 25-17.0021 and 25-17.008, Florida Administrative Code, and will establish DSM Goals at a reasonable and appropriate level for the period 2025 through 2034 and should be approved.
9. The Parties stipulate and agree that the stipulations and positions set forth herein are limited and apply only to OUC's proposed DSM Goals in Docket No. 20240017-EG, and in no way impact or limit any of the positions that Parties may take in any other current or future proceedings before the Commission, including, but not limited to, any other DSM Goals dockets currently pending before the Commission. Further, no Party agrees, concedes, or waives any position with respect to any of the issues identified in the Prehearing Order.
10. The Parties stipulate and agree that these stipulations fully resolve their respective issues in this proceeding and request that they be approved by the Commission.


**Remainder of page intentionally left blank.**

In Witness Whereof, OUC, Florida Rising, and SACE evidence their acceptance and agreement with all provisions of these stipulations by their signature.

***Orlando Utilities Commission***

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