

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of proposed  
demand-side management plan, by Florida  
Public Utilities Company.

DOCKET NO. 20240170-EG  
ORDER NO. PSC-2025-0091-PAA-EG  
ISSUED: March 24, 2025

The following Commissioners participated in the disposition of this matter:

MIKE LA ROSA, Chairman  
ART GRAHAM  
GARY F. CLARK  
ANDREW GILES FAY  
GABRIELLA PASSIDOMO SMITH

NOTICE OF PROPOSED AGENCY ACTION  
ORDER APPROVING FLORIDA PUBLIC UTILITIES COMPANY'S  
DEMAND-SIDE MANAGEMENT PLAN AND  
SUPPLEMENTAL LED LIGHTING PROGRAM WITH MODIFICATIONS

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.).

Background

Sections 366.80 through 366.83, and 403.519, Florida Statutes (F.S.), known collectively as the Florida Energy Efficiency and Conservation Act (FEECA), require the Florida Public Service Commission (Commission) to adopt conservation goals to increase the efficiency of energy consumption. FEECA emphasizes reducing the growth rates of weather-sensitive peak demand, reducing and controlling the growth rates of electricity consumption, reducing the consumption of expensive resources such as petroleum fuels, and encouraging demand-side renewable energy resources. We most recently established conservation goals for Florida Public Utilities Company (FPUC or Utility) by Order No. PSC-2024-0431-FOF-EG (2024 Goalsetting Order), issued September 20, 2024, in Docket 20240015-EG.<sup>1</sup>

On December 19, 2024, FPUC filed a petition requesting approval of its Demand-Side Management (DSM) Plan and the associated program standards. In addition, FPUC requested to

<sup>1</sup> 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)*.

add a supplemental program to its DSM Plan through the addition of the Light Emitting Diode (LED) Lighting program, which would not count towards the DSM goals. We have jurisdiction over this matter pursuant to Sections 366.80 through 366.83, and 403.519, F.S.

#### Legal Standard

Section 366.82(7), F.S., requires that following the adoption of annual conservation goals, this Commission shall require each utility subject to FEECA to develop a DSM plan to meet its conservation goals. Rule 25-17.0021(4), Florida Administrative Code (F.A.C.), requires each electric utility subject to FEECA to file its DSM plan, which consists of one or more DSM programs, and program participation standards for our approval.

We consider the appropriateness of DSM programs by evaluating the following criteria, first outlined in Order No. 22176: (1) whether the program advances the policy objectives of FEECA and its implementing rules (such as reducing demand and energy usage); (2) whether the program is directly monitorable and yields measurable results; and (3) whether the program is cost-effective. Pursuant to 366.82(7), F.S., we may then approve, modify, or deny the utility's DSM plan.

#### Decision and Analysis

We have reviewed FPUC's proposed DSM Plan, including its demand and energy savings, cost-effectiveness, and rate impact. Overall, FPUC's DSM Plan is consistent with the proposed programs used to establish the Utility's DSM goals and is projected to meet the FEECA annual numeric conservation goals approved by this Commission in the 2024 Goalsetting Order. The programs included in FPUC's proposed DSM Plan are also cost-effective based upon the Participants test and most programs pass the Total Resource Cost (TRC) test. In addition, the program participation standards appear to be consistent with FPUC's DSM Plan and the programs are directly monitorable and measurable. For these reasons, as explained more fully below, we approve FPUC's DSM Plan and associated program standards.

We have also reviewed FPUC's proposed supplemental DSM program—the LED Lighting program—which is focused on the replacement of existing non-LED outside lighting with more efficient LED options. The program's resulting net energy savings advance the policy objectives of FEECA and it is cost effective. In addition, the amount of savings per light fixture and number of light fixtures covered are both monitorable and measurable factors. However, we deny recovery of associated communication expenses, remove net base rate items for new LEDs, and adjust the amount to be recovered. Based on the foregoing reasons, as explained more fully below, we approve a modified supplemental LED Lighting program and program standards.

## **I. Demand-Side Management Plan**

### *a. Description of Demand-Side Management Plan*

FPUC's proposed DSM Plan consists of seven programs in total, including four residential and three commercial/industrial programs. A complete list of the programs and a brief description of each can be found in Attachment A of this Order.

The DSM Plan retains the Residential HVAC program and rebrands the Residential Energy Survey program as "Efficiency 1<sup>st</sup>" with a stronger emphasis on do-it-yourself energy-saving installations. In addition, FPUC will be introducing a new web-based platform to enhance delivery of the Efficiency 1<sup>st</sup> survey program. These programs include updated rebate amounts, and a new weatherization and home energy kit. Meanwhile, FPUC is addressing limited participation in commercial programs by adding an interior lighting option and increased rebate amounts for the Commercial HVAC program.

In terms of new programs, FPUC is launching a residential low income program called "Efficiency for All." This program will assist low income families with energy efficiencies that will benefit all customers.

We find the programs included in FPUC's DSM Plan to be consistent with the proposed programs used to develop the Utility's DSM goals in its 2024 goalsetting proceeding. We further find that the projected program demand and energy savings meet the goals established by us in the 2024 Goalsetting Order. These programs advance the policy objectives of FEECA.

### *b. Program Participation*

FPUC's program participation standards can be found in Attachment B of this Order. The projected program participation rates for the programs included in its DSM Plan are consistent with the participation rates provided for the proposed programs used to develop FPUC's DSM goals. We find that the DSM Plan programs are directly monitorable and measurable. FPUC is responsible for monitoring actual participation rates and seeking Commission action, if necessary, to modify, add, or remove programs and/or standards as necessary to meet the annual conservation goals. If FPUC is unable to meet the DSM goals established by us, the Utility may be subject to appropriate action, up to and including financial penalties.

### *c. Cost-Effectiveness Review*

As required by Rule 25-17.008, F.A.C., FPUC provided cost-effectiveness analyses for the programs included in its DSM Plan using the Participants, Rate Impact Measure (RIM), and TRC tests. All of FPUC's DSM programs passed the Participants test, all but two passed the TRC test, and all failed the RIM test. "[W]e have flexibility in how we interpret and apply the cost-effectiveness tests required pursuant to Rule 25-17.008, F.A.C."<sup>2</sup> Furthermore, cost-

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<sup>2</sup> Order No. PSC-2020-0274-PAA-EG, issued August 3, 2020, in Docket Nos. 20200053-EG, 20200054-EG, 20200055-EG, 20200056-EG, & 20200060-EG, *In re: Petition for approval of demand-side management plan, by Tampa Electric Company, In re: Petition for approval of proposed demand-side management plan, by Duke Energy*

effectiveness is but one of the factors we weigh when analyzing DSM programs.<sup>3</sup> The results of these cost-effectiveness analyses are consistent with the cost-effectiveness analyses results provided for the proposed programs which were used to develop FPUC's DSM goals in its 2024 goalsetting proceeding. Therefore, we find the DSM Plan programs to be cost-effective under the Participants test and all but two programs are cost-effective under the TRC test.

*d. Rate Impact*

Table 1 shows an estimate of the annual Energy Conservation Cost Recovery (ECCR) clause expenditures and monthly rate impact on a typical residential customer for FPUC's DSM Plan.

**Table 1**  
**FPUC's DSM Plan Annual ECCR Costs and Estimated Monthly Impact**

<b>Year</b>	<b>Annual ECCR Costs (\$)</b>	<b>Residential Customer (\$/1,200 kWh-mo)</b>
<b>2025</b>	\$731,191	\$1.45
<b>2026</b>	\$753,127	\$1.45
<b>2027</b>	\$775,721	\$1.45
<b>2028</b>	\$798,992	\$1.45
<b>2029</b>	\$822,962	\$1.45
<b>2030</b>	\$847,651	\$1.45
<b>2031</b>	\$873,080	\$1.45
<b>2032</b>	\$899,273	\$1.45
<b>2033</b>	\$926,251	\$1.45
<b>2034</b>	\$954,038	\$1.45
<b>Total</b>	\$8,382,285	-

Source: Document No. 00799-2025.

*e. Conclusion*

FPUC's DSM Plan is consistent with the proposed programs used to establish its DSM goals and is projected to meet the FEECA annual numeric conservation goals approved by us in

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*Florida, LLC, In re: Petition for approval of proposed demand-side management plan, by Gulf Power Company, In re: Petition for approval of demand-side management plan and request to modify residential and business on call tariff sheets, by Florida Power & Light Company, & In re: Petition for approval of demand-side management plan, by Florida Public Utilities Company, p. 4.*

<sup>3</sup> See Order No. PSC-2019-0509-FOF-EG, issued November 26, 2019, in Docket No. 20190015-EG, *In re: Commission review of numeric conservation goals (Florida Power & Light Company)*, pp. 8–10 (finding that despite demand-side renewable energy systems not being cost-effective, continued encouragement of those systems through net metering practices nonetheless furthered FEECA); Order No. PSC-97-0528-FOF-EG, issued May 7, 1997, in Docket No. 960624-EG, *In re: Petition for approval of Green Pricing Research and Development Project by Florida Power & Light Company*, pp. 1–2 (approving not cost-effective DSM program involving photovoltaic modules when program could ultimately contribute to commercialization of renewable technologies or stimulate economic and technological growth in renewable technologies).

the 2024 Goalsetting Order. The programs included in FPUC's proposed DSM Plan are also cost-effective based upon the Participants test and all but two programs are cost-effective based upon the TRC test. In addition, the program participation standards appear to be consistent with FPUC's DSM Plan and the programs are directly monitorable and measurable. Therefore, we approve FPUC's DSM Plan and program standards.

The Utility shall be allowed to file for cost recovery of the programs included in its DSM Plan in the ECCR clause. However, to recover those costs, FPUC will need to demonstrate that the expenditures to implement its DSM programs were reasonable and prudent.

## **II. Light Emitting Diode Lighting Program**

### *a. Utility's Proposal*

In addition to the DSM Plan approved in Section I, FPUC requested that we authorize a supplemental new program. FPUC does not seek to have the demand and energy savings associated with this program included in the calculation of the Utility's annual numeric conservation goals. Furthermore, unlike traditional conservation programs in which a participating customer receives a rebate or credit, here the Utility would receive a credit for each non-LED light replaced, to be recovered through the ECCR clause. For these reasons, we address this proposed program separately.

The LED Lighting program is a program focused on the replacement of existing non-LED outside lighting, such as high pressure sodium (HPS) or metal halide (MH) lights, with LED lighting options that are more efficient. The proposed program is structured as a temporary, two-year conservation initiative (to begin the first quarter of 2025) aimed at recovering depreciation and investment-related expenses through the aforementioned targeted conservation measure. Specifically, the program focuses on offsetting costs associated with converting 7,122 streetlamps to high-efficiency LEDs.

By Order No. PSC-2022-0132-TRF-EI, we closed FPUC's Rate Schedule LS of non-LED offerings to new customers and included LED replacement options.<sup>4</sup> However, the Utility has not yet replaced all the existing customers' lighting fixtures. The proposed LED Lighting program would expedite the remaining conversion process.

FPUC seeks to recover the unrecovered plant costs of the HPS and MH lights of the old non-LED lighting, incremental expenses for the new LED lighting, and additional marketing expenses associated with the program. In particular, FPUC petitions for recovery of a regulatory asset over two years based upon the projected cost of (1) unrecovered plant costs of the HPS and MH lights, (2) net rate base expenses associated with the new LED lights, such as return on investment, depreciation, and property taxes, and (3) communication expenses for customers. For purposes of cost recovery, FPUC requests recovery in the ECCR of the unamortized costs for

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<sup>4</sup> See Order No. PSC-2022-0132-TRF-EI, issued April 8, 2022, in Docket No. 20220011-EI, *In re: Petition to modify tariff to close existing lighting tariff to new business and introduce new LED lighting tariff by Florida Public Utilities Company*.

HPS and MH lights removed both during the prior year and current year, or are expected to be removed through the projection year. The regulatory asset for the unrecovered plant associated with the HPS and MH lights would be expensed for each light replaced with the intention of resulting in a zero balance at the end of the program. FPUC plans to file a petition to address the net unrecovered cost of the new LED lights in a future tariff proceeding.

The Utility estimates the unamortized costs for the HPS and MH lighting to be \$1,224,541 for 7,122 lights, or \$171.94 per light, as of the end of December 2024. This value would be adjusted at the beginning of the program to reflect actual costs as of the date our decision becomes final. The net rate base expenses, an estimated \$206,638 over the two-year period, and communication expenses of \$15,000, brings the total program cost to \$1,446,179, or \$203.06 per light that would be recovered in the ECCR. This results in an annual cost of the program of \$723,090, assuming approximately 300 fixtures are replaced monthly using a combination of Utility staff and contractors. This results in a rate impact of \$1.44/mo. for 2025 and \$1.40/mo. for 2026 for a typical residential 1,200 kWh monthly bill. Table 2 summarizes the proposed costs to be recovered under the program.

<b>Expense</b>	<b>2025</b>	<b>2026</b>	<b>Total</b>	<b>Unit Cost*</b>
	<b>(\$)</b>	<b>(\$)</b>	<b>(\$)</b>	<b>(\$/Fixture)</b>
<u>Non-LED Lighting Expenses</u>				
Unrecovered Depreciation	\$612,271	\$612,271	\$1,224,542	\$171.94
<u>New LED Lighting Expenses</u>				
Net Return on Investment	\$3,397	\$215,876	\$219,273	\$30.79
Net Depreciation Expense	(\$68,454)	\$5,496	(\$62,958)	(\$8.84)
Net Property Taxes	\$0	\$50,322	\$50,322	\$7.07
<u>Administrative Expenses</u>				
Marketing/Communications	\$7,500	\$7,500	\$15,000	\$2.11
<b>Total</b>	<b>554,714</b>	<b>\$891,465</b>	<b>\$1,446,179</b>	<b>\$203.06</b>

Source: Document No. 10305-2024.

*b. Program Review and Approval with Modification*

The proposed program is similar in structure to Tampa Electric Company's (TECO's) Street and Outdoor Lighting Conversion Program, which also featured recovery of unamortized cost of non-LED lighting.<sup>5</sup> In that docket, we allowed recovery of the unrecovered plant associated with the non-LED lighting but excluded recovery of advertising/communication expenses. TECO did not request recovery of incremental rate base costs associated with the new LED lighting.

<sup>5</sup> See Order No. PSC-2018-0110-PAA-EI, issued February 27, 2018, in Docket No. 20170199-EI, *In re: Petition for approval of conservation street and outdoor lighting conversion program, by Tampa Electric Company.*

Based upon the record before us, we find that the LED Lighting program is appropriate for DSM because it will result in net energy savings that serve a conservation purpose and advance the policy objectives of FEECA by replacing non-LED outside lighting with more efficient LED lighting options.

Overall, using the Utility's requested expenses, the program has a cost-effectiveness ratio above 1.0 for both the RIM (1.075) and TRC (1.824) tests. Therefore, we also find the LED Lighting program to be a cost-effective.

Finally, we find that the amount of savings per light fixture and number of light fixtures covered are both monitorable and measurable factors, as demonstrated above in Section II(a) and Table 2. However, we deny the following requested expenses associated with FPUC's request. First, we remove possible recovery of communication expenses. Communication expenses are not appropriate here because participation in the DSM program is non-voluntary and is done at the Utility's discretion, not the lighting customer's. Our removal of communication expenses in this circumstance is consistent with our decision in Order No. PSC-2018-0110-PAA-EI.

Second, we remove the requested net rate base expenses. Customers will be paying rates under FPUC's Rate Schedule LS for the new LED lights, which is the appropriate place for recovery of new assets. Rate base expense recovery is more appropriate in a base rate case, not a cost recovery clause proceeding. Based on the values in Table 2, these two adjustments reduce FPUC's total request by \$221,637.

Third, the amount of the regulatory asset and the credit per light must be adjusted to reflect the remaining balance and number of fixtures as of the date of program approval. This is because pursuant to Section 366.82(7), F.S., any incremental lighting replaced before our approval of a DSM program is not eligible for ECCR. Prior Commission approval is a condition precedent.

In order to record and recover the unamortized portion approved by us of the HPS and MH lighting, we authorize FPUC to create a regulatory asset for the amount associated with the unrecovered plant (i.e., the non-LED lights to be converted). We find the establishment of a regulatory asset in this case to be appropriate because it will allow for FPUC to recover the associated costs over a multi-year period as contemplated in its petition. However, we find that our approval of FPUC's regulatory asset does not limit our ability to review the amounts and recovery period for reasonableness in any future proceeding where the regulatory asset is included. In other words, any remaining balance in the regulatory asset at the end of the LED Lighting program will be evaluated in a future proceeding for recovery.

To reflect our Ordered modifications, FPUC shall file the updated unrecovered balance as adjusted above and number of fixtures based on the date our decision becomes final, and revised program standards with a per-light credit value reflecting the updated values. Our staff will have administrative authority to approve these revised program standards, provided they are consistent with our decision.

*c. Conclusion*

FPUC's proposed supplemental LED Lighting program falls under the umbrella of DSM. The program advances the conservation policy objectives of FEECA, is monitorable and measurable, and is cost-effective. However, any demand and energy savings associated with this program will not be included in the calculation of the Utility's annual numeric conservation goals. Furthermore, we modify the LED Lighting program by (1) removing communication expenses, (2) removing net base rate items for new LEDs, and (3) adjusting the amount to be recovered and the credit to reflect the remaining balance and number of fixtures as of the date our decision becomes final. Consistent with our decision herein, we approve FPUC's request to create a regulatory asset related to the unrecovered amount of the non-LED lighting as adjusted. Again, we stress that the approval to record the regulatory asset for accounting purposes does not limit this Commission's ability to review the amounts and recovery period for reasonableness in a future proceeding in which the regulatory assets are included. Therefore, we approve the modified LED Lighting program. Staff shall have administrative authority to approve the revised program standards.

The Utility shall be allowed to file for cost recovery of the unamortized portion of the HPS and MH lighting in the ECCR clause. However, to recover those costs, FPUC will need to demonstrate that the expenditures to implement this DSM program were reasonable and prudent.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that Florida Public Utilities Company's Demand-Side Management Plan, as described in Attachment A, is approved. It is further

ORDERED that Florida Public Utilities Company's program participation standards, as described in Attachment B, are consistent with the Demand-Side Management Plan and are approved. It is further

ORDERED that the Light Emitting Diode Lighting program is approved as modified herein. It is further

ORDERED that Florida Public Utilities Company shall file the updated unrecovered balance as adjusted above and number of fixtures based on the date our decision becomes final and revised program standards with a per-light credit value reflecting the updated values. Florida Public Service Commission staff shall have administrative authority to approve the revised program standards consistent with our decision herein. It is further

ORDERED that Florida Public Utilities Company is authorized to create a regulatory asset for the amount associated with the unrecovered plant (i.e., the non-LED lights to be converted) as set forth herein. The approval of this regulatory asset shall not limit the Florida Public Service Commission's ability to review the amounts and recovery period for reasonableness in any future proceeding where the regulatory asset is included. It is further



ORDERED that Florida Public Utilities Company may file for cost recovery of the programs included in the Demand-Side Management Plan and of the Light Emitting Diode Lighting program in the Energy Conservation Cost Recovery proceeding. However, to recover those costs, Florida Public Utilities Company shall need to demonstrate that the expenditures to implement those programs were reasonable and prudent. It is further

ORDERED that Florida Public Utilities Company is responsible for monitoring actual participation rates and petitioning, if necessary, to modify, add, or remove programs and/or standards as necessary to meet the annual conservation goals. If Florida Public Utilities Company is unable to meet the goals established by us in the 2024 Goalsetting Order, then Florida Public Utilities Company may be subject to appropriate action, up to and including financial penalties. It is further

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, Florida Administrative Code, 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 or Judicial Review" attached hereto. It is further

ORDERED that in the event this Order becomes final, this docket shall be closed.

By ORDER of the Florida Public Service Commission this 24th day of March, 2025.



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ADAM J. TEITZMAN  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399  
(850) 413-6770  
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Copies furnished: A copy of this document is provided to the parties of record at the time of issuance and, if applicable, interested persons.

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission (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 April 14, 2025.

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.

## **Florida Public Utility Company 2025 – 2034 DSM Programs**

### **Residential Programs:**

#### ***Residential Energy Survey Program (Efficiency First)***

The Efficiency First Program provides FPUC's residential customers with energy conservation advice that encourages the implementation of efficiency measures that result in energy savings. Once implemented, these measures also lower FPUC's energy requirements and improve operating efficiencies.

#### ***Residential Heating and Cooling Efficiency Upgrade Program***

The Residential Heating and Cooling Upgrade Program incentivize customers operating inefficient heat pumps and air conditioners to replace them with more efficient units. This program provides incentives to install a new heat pump or replace older heat pumps or air conditioners with more efficient units.

#### ***Low-Income Energy Outreach (Efficiency for All)***

The Efficiency for All Program is aimed at enhancing energy efficiency in low-income households and communities. Participants will complete online energy surveys and monitor their monthly energy consumption. Upon reaching specific milestones, the participants will receive tiered incentives such as weatherization kits, smart power strips, and programmable thermostats.

#### ***Residential Small Appliance Program***

This program offers a \$25 rebate to residential customers who purchase an Energy-Star certified clothes washer. These washers use approximately 20% less energy and 30% less water than standard models, leading to significant utility savings over time and reduce environmental impacts.

### **Commercial Programs:**

#### ***Commercial Heating and Cooling Efficiency Upgrade Program***

The Commercial Heating and Cooling Efficiency Upgrade Program provides rebates to small commercial customers (customers with a maximum 5 ton units) if the customers install a high-efficiency central air conditioner or heat pump with a minimum 15 SEER.

#### ***Commercial Chiller Upgrade Program***

This program aims to mitigate the growth of peak demand and energy consumption across FPUC's commercial and industrial sectors. To achieve this, the program requires customers to replace existing chillers with more efficient systems.

#### ***Commercial Indoor Lighting Program***

The Commercial Exterior and Interior Lighting Program is a new addition to FPUC's energy conservation offerings. This program encourages non-residential customers to replace outdated, inefficient lighting systems with modern, energy-efficient alternatives. Incentives are based on projected annual energy savings and accommodates a wide range of end-use applications.

2025 Demand Side Management Plan Program Standards

Florida Public Utilities Company

## APPENDIX A

Florida Public Utilities Company 2025  
Demand-Side Management Plan  
Program Standards

## ***Residential Energy Survey***

### **Program Description**

#### **Summary of the Efficiency 1st Program**

The Efficiency 1st Program is a customer-focused energy efficiency initiative designed to promote energy conservation through an easy-to-use, reward-based system. By leveraging digital tools and vendor partnerships, the program simplifies participation and encourages residential customers to adopt energy-saving behaviors and technologies. This modern approach prioritizes convenience and engagement to drive meaningful energy savings.

Central to the program is its online infrastructure, which provides customers with an intuitive platform to complete energy surveys, track monthly energy consumption, and receive personalized recommendations. The platform integrates participation seamlessly with automated triggers, ensuring timely delivery of rewards and incentives. Customers earn rewards for reaching specific milestones, such as completing energy surveys and tracking consumption. Incentives include weatherization kits, smart power strips, and advanced options like smart thermostats, which foster ongoing engagement and further energy savings.

The program also relies on vendor partnerships to manage the fulfillment and direct shipping of rewards, ensuring efficient logistics and delivery of high-quality energy-saving products. To enhance customer engagement, the program provides educational materials and interactive tools that empower participants to make informed decisions about their energy usage. By understanding their consumption patterns, customers can better manage energy costs and implement efficiency measures effectively. The streamlined process minimizes barriers to entry, maximizing accessibility for all residential customers, including low-income households.

The Efficiency 1st Program aims to promote the adoption of energy-efficient technologies and practices, deliver measurable reductions in energy consumption, and serve as a foundational component for broader energy conservation initiatives, such as the "Efficiency for All" program. By combining innovative digital infrastructure, customer engagement, and vendor collaboration, the Efficiency 1st Program establishes a scalable model for utility-driven efficiency efforts while contributing to long-term energy savings for its participants.

*Eligibility*

**Eligibility Criteria for the Efficiency 1st Program**

The **Efficiency 1st Program** is open to all residential customers served by Florida Public Utilities Company (FPUC). Participation begins with the **Residential Energy Survey Program**, which provides a cost-free energy audit in accordance with Rule 25-17.003 of the Florida Administrative Code. These audits are designed to equip customers with tailored information to identify energy-saving measures that best meet their individual needs.

Key aspects of eligibility include:

1. **Residential Customer Status**  
All FPUC residential customers are eligible to participate, ensuring broad access to energy-saving opportunities.
2. **Energy Survey Participation**  
Customers must complete the Residential Energy Survey, which acts as a foundation for participation. This survey identifies energy inefficiencies and recommends customized solutions.
3. **Notification and Awareness**  
Customers are notified about the availability of the cost-free energy audit every six months, as required by Rule 25-17.003, ensuring ongoing awareness of the program.

By aligning with Florida's regulatory requirements, the **Efficiency 1st Program** ensures equitable access to energy-saving measures while providing customers with actionable insights to reduce energy use and improve efficiency.

*Re-eligibility*

Applicants who have previously participated in the **Efficiency 1st Program** must wait five years from the fulfillment date of the kit they received to reapply. In case of a malfunction of any item, including a smart power strip or thermostat, customers should consult the item's specific warranty information and seek replacement through the warranty provider.

### *Program Procedures*

The **Efficiency 1st Program** provides a streamlined and accessible process for FPUC residential customers to enroll, earn incentives, and adopt energy-saving measures. Customers can easily enroll online through the program's website by completing a simple registration form or over the phone with the assistance of a customer service representative. These options ensure broad accessibility and ease of entry into the program.

Upon enrollment, participants are encouraged to complete a **Residential Energy Survey**, which is available online or over the phone. This survey assesses energy usage patterns and offers tailored recommendations for energy efficiency improvements. As an incentive for completing the survey, customers receive a **Weatherization Kit**, which includes items such as weatherstripping, LED bulbs, and energy-saving tips. Once the kit is delivered, supplemental communication—via email, text messages, or follow-up calls—guides customers through the installation process, offering step-by-step instructions, video tutorials, and access to an interactive online portal to log their progress.

After installing the Weatherization Kit, customers confirm completion through a follow-up survey or by uploading photos of the installed measures to the program's portal. Verified participants are then eligible for the next incentive tier: a **Smart Home Energy Kit** that includes advanced tools such as a smart power strip or thermostat. Continued communication keeps participants engaged, providing energy-saving tips, progress tracking, and information about future rewards for ongoing participation. This structured approach ensures customers are supported and motivated throughout the program, fostering widespread adoption of energy-efficient practices and technologies.

### *Savings Verification*

FPUC conducts follow-up surveys with customers after they implement the recommended energy-saving measures. The data collected from these surveys is used to more accurately assess the impact of the energy surveys on energy usage. Reporting for this program will comply with Rule 25-17.0021(5) of the Florida Administrative Code. Furthermore, program expenses will be detailed in the BCCR True-Up and Projection filings.

## ***Residential Heating and Cooling Efficiency Upgrade Program***

### ***Program Description***

Our incentive program aims to curb the growth of peak energy demand across Florida Public Utilities Company's (FPUC) service areas by promoting the adoption of high-efficiency heat pumps and central air conditioning systems. To qualify, customers must install one of the qualifying systems. The program offers two rebate tiers based on the system's Seasonal Energy Efficiency Ratio (SEER) or the updated SEER2 rating: Tier 1 provides a \$250 rebate for systems with a SEER ranging from the current doe minimum of 15 SEER (14.3 SEER2) to 17.7 (equivalent to SEER2 below 17), while Tier 2 offers a \$500 rebate for systems with a SEER of 17.7 or higher (SEER2 of 17 or above). This structure ensures that more efficient systems receive higher rebates, encouraging energy conservation and reducing utility costs. The Residential Heating & Cooling Efficiency Upgrade Program focuses on two key areas: encouraging customers with inefficient heat pumps and air conditioners to upgrade to more efficient units and motivating those replacing end-of-life systems to choose units exceeding current codes and standards. This incentive also applies to new construction residences. By promoting the installation of high-efficiency equipment, the program aims to enhance energy efficiency, reduce peak demand, and support environmental sustainability.

### ***Customer Eligibility Requirements***

- The program applies to straight air conditioners or heat pumps.
- The program applies to replacements as well as new installations.
- The residential dwelling must be an existing single-family structure in FPUC's electric service territory. Mobile homes are eligible if their wheels have been removed and they are set on a lot.
- For a new heat pump installed or a heat pump being replaced, the maximum supplemental strip heating physically contained in the system shall not exceed 2 kW per nominal ton. On a system of less than 2.5 tons, a 5 kW heat strip will be allowed.
- For a heat pump using supplemental strip heating, a two-stage indoor thermostat is required.
- If replacing a straight cooling system, the residence cannot have oil or electric resistance as the primary heat source.
- In the situation where a replacement heating and cooling system will qualify for two rebates (FPUC's and a gas company's), FPUC will not pay its rebate so that a double payment is avoided.
- HVAC contractors will submit rebate request forms to FPUC. The contractor, certifying that the equipment installed accords with the program standards, will sign the form. The customer will sign the form verifying that the equipment was installed and that the incentive recipient's name and mailing address are correct.



- The Heating and Cooling Rebate request form must be received within 30 days of the installation date of the unit to assure the payment of the dealer incentive.
- FPUC will randomly perform full field verifications on a minimum of 10 percent of the participating homes. Homes not selected for the field review will have a telephone or written verification to validate the rebate information.
- FPUC will inspect all mobile home applications to ensure that the wheels are removed and they are set on a lot.
- No payments will be made until FPUC verifies or validates rebate requests.

#### *Re-eligibility*

Applicants who have previously participated must wait five years from the fulfillment date of the incentive they received to reapply.

#### *Rebates and Incentives*

Our incentive program offers two tiers of rebates to encourage the adoption of high-efficiency air-source heat pumps (ASHP) and ground-source heat pumps (GSHP) in residential settings. These incentives are structured to promote energy conservation and reduce utility costs by rewarding the installation of more efficient systems.

Tier 1: Eligible for a \$250 rebate, this tier includes:

- ASHPs with a minimum efficiency of 15 SEER (14.3 SEER2) when replacing electric resistance heating.
- ASHPs meeting the Consortium for Energy Efficiency (CEE) Tier 2 standards: 16.8 SEER (16 SEER2) and 9.0 HSPF.
- ASHPs that are ENERGY STAR certified or meet CEE Tier 1 criteria: 16 SEER (15.2 SEER2) and 9.0 HSPF.

Tier 2: Offering a \$500 rebate, this tier encompasses:

- ASHPs with an efficiency of 24 SEER (22.9 SEER2) when replacing electric resistance heating.
- ASHPs achieving a minimum of 24 SEER (22.9 SEER2) and 10.5 HSPF.
- ASHPs that comply with the CEE Advanced Tier: 17.8 SEER (17 SEER2) and 10.0 HSPF.
- ENERGY STAR certified ground-source heat pumps.

*Program Procedures*

HVAC contractors will submit rebate request forms to FPUC within 120 days after completion. The contractor, certifying that the equipment installed accords with the program standards and providing information on the replaced and new heat pump or air conditioner, will sign the form and indicate which type of rebate is being requested. The customer will sign the rebate form verifying that the equipment was installed and that the incentive recipient's name and mailing address are correct and submit the receipt for the installation. No payments will be made until FPUC verifies and approves the rebate request. Once FPUC approves the rebate request, FPUC's contractor for issuing rebates will issue an FPUC Visa gift card (or check when appropriate) via First-Class mail to the customer or contractor within 30 business days. The contractor will be paid by check within 30 business days for the dealer rebate when the rebate request is approved.

*Savings Verification*

FPUC performs follow-up surveys with customers after program participation. The data gathered from these surveys helps to more precisely evaluate the efficacy of the program. Reporting for this program will adhere to Rule 25-17.0021(5) of the Florida Administrative Code. Additionally, program expenses will be outlined in the ECCR True-Up and Projection filings.

## Residential Small Appliance Program

### Program Description

Our incentive program provides a \$25 rebate to residential customers who purchase an ENERGY STAR-certified clothes washer. These washers consume about 20% less energy and 30% less water compared to standard models, resulting in substantial utility savings over time.

By encouraging the adoption of high-efficiency appliances, this program seeks to lower household utility expenses and reduce environmental impact. Promoting the use of ENERGY STAR-certified clothes washers lays the groundwork for expanding similar incentives to other energy-efficient technologies in the future.

### *Customer Eligibility Requirements*

To qualify for the \$25 rebate for ENERGY STAR-certified clothes washers, customers must be residential account holders with Florida Public Utilities Company (FPUC), purchase an eligible ENERGY STAR-certified clothes washer, provide a valid sales receipt or invoice detailing the purchase, and submit a completed rebate application with the necessary documentation within 90 days of purchase.

### *Re-eligibility*

Applicants who have previously participated must wait five years from the fulfillment date of the incentive they received to reapply.

### *Rebates*

Florida Public Utilities Company (FPUC) offers a \$25 rebate to residential customers who purchase an ENERGY STAR-certified clothes washer.

### *Program Procedures*

FPUC residential customers can visit the FPUC website to access information about electric energy conservation rebates. The site provides clear instructions for submitting an online rebate application and includes contact details for customers who have additional questions or need further assistance. Customers will be required to show proof of purchase.

### *Savings Verification*

FPUC conducts follow-up surveys with customers after their participation in the program. The data collected from these surveys is used to more accurately assess the program's effectiveness. Program reporting will comply with Rule 25-17.0021(5) of the Florida Administrative Code, and program expenses will be detailed in the ECCR True-Up and Projection filings.

## Efficiency for All

### *Program Description*

The Efficiency for All Program is an energy conservation initiative aimed at enhancing energy efficiency in low-income households and communities. Participants begin by completing online energy surveys and monitoring their monthly energy consumption. Upon reaching specific milestones, they receive tiered incentives such as weatherization kits, smart power strips, and programmable thermostats. The program emphasizes community-wide engagement and collaborates with vendors to facilitate the delivery and installation of energy-saving measures. Its primary objective is to alleviate participants' energy burdens while fostering sustainable conservation habits. This approach promotes inclusivity, aligns with regulatory goals, and provides measurable benefits to all stakeholders.

### *Customer Eligibility Requirements*

In its first year (2025), the Efficiency for All Program will operate on a community-by-community basis to ensure targeted and effective implementation. Participation will be limited to low-income housing developments, multifamily buildings, and similar residential complexes, with administrative approval required to align with program goals. This approach prioritizes communities with the greatest need and readiness to participate.

Communities must submit an application for approval, demonstrating energy cost burdens, resident engagement resources, and commitment to the program. Eligible residents within these communities must meet income thresholds consistent with federal or state low-income assistance criteria. Participants will also need to attend an energy conservation workshop and agree to share energy usage data to evaluate program success and refine strategies.

The program will launch with limited availability in 2025 as a pilot initiative, focusing on select communities. Insights from this initial phase will guide improvements and expansion in 2026 to include additional eligible communities and housing developments, ensuring a scalable and sustainable impact.

### *Re-eligibility*

Applicants who have previously participated must wait five years from the fulfillment date of the kit or kits they received to reapply.

### *Rebates*

The Efficiency for All Program provides low-income participants with energy-saving incentives by partnering with contractors and vendors to handle installation. Unlike the self-installation model of

the Efficiency 1st Program, this initiative ensures qualifying participants receive professional installation of weatherization kits and smart energy devices at no cost.

Through these partnerships, FPUC removes barriers to participation, ensuring equitable access to energy efficiency upgrades while simplifying the process for residents. This approach allows participants to immediately benefit from reduced energy costs and improved home comfort, maximizing the program's impact on energy conservation and affordability.

#### *Program Procedures*

FPUC residential customers can visit the FPUC website to learn about electric energy conservation rebates and participate in the Efficiency for All Program. The website offers clear instructions for organizations and housing community administrators to submit requests for consideration in the 2025 pilot program.

#### *Savings Verification*

FPUC conducts follow-up surveys with customers after program participation to gather data that enables a more accurate assessment of the program's effectiveness. Reporting for the program will align with Rule 25-17.0021(5) of the Florida Administrative Code, and associated expenses will be detailed in the ECCR True-Up and Projection filings.

## Commercial HVAC Program

### *Program Description*

Florida Public Utilities Company (FPUC) aims to continue its Commercial Heating & Cooling Efficiency Upgrade Program, offering rebates to small commercial customers. The program is designed to reduce peak demand and limit energy consumption growth in FPUC's commercial sector by encouraging the adoption of high-efficiency heat pumps and air conditioning systems.

### *Eligibility Requirements*

To qualify for Florida Public Utilities Company's (FPUC) Commercial Heating and Cooling Efficiency Upgrade Program, applicants must be non-residential customers within FPUC's electric service territory. Participants must submit a completed rebate application, including proof of purchase and installation, within one year of the installation date. Rebate amounts and efficiency criteria may change, so please refer to FPUC's official rebate guidelines for the most up-to-date information.

### *Re-eligibility*

Applicants who have previously participated must wait five years from receiving the incentive before becoming eligible to participate again.

### *Rebates*

Florida Public Utilities Company (FPUC) provides rebates to non-residential customers who upgrade to high-efficiency heating and cooling systems, supporting energy efficiency initiatives. Rebate amounts are determined by the type and capacity of the installed equipment, as outlined below:

#### **Rebate Criteria:**

- **High-Efficiency Direct Expansion (DX) Systems:**
  - *Capacity Less than 5.4 Tons:* \$100 customer rebate; \$25 dealer incentive.
  - *Capacity Between 5.4 and 11.25 Tons:* \$100 customer rebate; \$25 dealer incentive.
- **High-Efficiency Packaged Terminal Heat Pumps (PTHP):**
  - \$100 customer rebate; \$25 dealer incentive.

*Program Procedures*

HVAC contractors must submit rebate request forms to FPUC within 120 days of project completion. The contractor is responsible for certifying that the installed equipment complies with program standards and for providing details on both the replaced and new heat pump or air conditioning system. The form must include the contractor's signature, specifying the rebate type, and the customer's signature to confirm installation, verify the incentive recipient's name, and provide the correct mailing address. A receipt for the installation must also be submitted.

Rebate payments will only be issued after FPUC verifies and approves the request. Upon approval, FPUC's rebate processing contractor will mail an FPUC Visa gift card (or a check, if applicable) via First-Class mail to the customer or contractor within 30 business days. Dealer rebates will be paid by check within 30 business days following approval of the rebate request.

*Savings Verification*

FPUC conducts follow-up surveys with customers after program participation to collect data for a more precise evaluation of the program's effectiveness. Program reporting will comply with Rule 25-17.0021(5) of the Florida Administrative Code, and related expenses will be outlined in the ECCR True-Up and Projection filings.

## Commercial Chiller Upgrade Program

### *Program Description*

Florida Public Utilities Company (FPUC) seeks to continue its Commercial Chiller Upgrade Program with updated costs and savings projections. This program aims to mitigate the growth of peak demand and energy consumption across FPUC's commercial and industrial sectors. To achieve this, the program requires customers to replace existing chillers with more efficient systems.

### *Eligibility Requirements*

The program includes water-cooled centrifugal chillers, water-cooled scroll or screw chillers, and air-cooled electric chillers. Minimum efficiency requirements for each chiller type, based on size, are outlined in the participation standards section. Customers must submit project proposals to FPUC, after which a pre-installation on-site inspection will be scheduled. Upon project completion, an FPUC representative will perform a final inspection. Compliance with these guidelines is required for rebate eligibility.

### *Re-eligibility*

Applicants who have previously participated are eligible to reapply five years after the date they received their incentive.

### *Rebates*

Florida Public Utilities Company (FPUC) offers two fixed-cost rebate tiers to incentivize non-residential customers to upgrade to high-efficiency water-cooled chillers, promoting significant energy savings:

#### **Rebate Tiers:**

1. **Tier 1:** For annual energy savings up to 15,000 kWh, customers receive a rebate of \$0.22 per kWh saved.
2. **Tier 2:** For annual energy savings exceeding 15,000 kWh, the rebate is \$0.17 per kWh saved.

#### **Application Examples:**

- A 200-ton centrifugal compressor chiller achieving 15,741 kWh in annual savings qualifies for Tier 2, resulting in a rebate of approximately \$2,676.
- A 500-ton centrifugal compressor chiller with 34,220 kWh in annual savings also falls under Tier 2, leading to a rebate of about \$5,817.
- A 175-ton rotary or screw compressor chiller saving 11,977 kWh annually is eligible for Tier 1, amounting to a rebate of approximately \$2,635.



These rebate tiers are designed to encourage the adoption of energy-efficient chillers, thereby reducing operational costs and promoting environmental sustainability.

*Note: Rebate amounts are subject to change. For the most current information, please refer to FPUC's official rebate guidelines.*

#### *Program Procedures*

HVAC contractors must submit rebate request forms to FPUC within 120 days of project completion. Contractors are responsible for certifying that the installed equipment meets program standards and providing details of both the replaced and new heat pump or air conditioning system. The form must include the contractor's signature to specify the rebate type, the customer's signature to confirm installation, and verification of the incentive recipient's name and correct mailing address. A receipt for the installation must also accompany the submission.

Rebate payments will be processed only after FPUC verifies and approves the request. Once approved, FPUC's rebate processing contractor will issue an FPUC Visa gift card (or a check, if applicable) via First-Class mail to the customer or contractor within 30 business days. Dealer rebates will be issued by check within 30 business days following approval of the rebate request.

#### *Savings Verification*

FPUC conducts follow-up surveys with customers following program participation to gather data for accurately evaluating the program's effectiveness. Reporting will adhere to Rule 25-17.0021(5) of the Florida Administrative Code, with associated expenses detailed in the ECCR True-Up and Projection filings.

## Commercial Exterior & Interior Lighting Program Program

### *Program Description*

The Commercial Exterior and Interior Lighting Program is a recent addition to Florida Public Utilities Company's (FPUC) energy conservation initiatives. It is designed to encourage non-residential customers to upgrade outdated, inefficient lighting systems to modern, energy-efficient alternatives. Incentives are offered based on anticipated annual energy savings, covering a broad range of end-use applications.

### *Eligibility Requirements*

To participate in Florida Public Utilities Company's (FPUC) Commercial Exterior and Interior Lighting Program, non-residential customers must be located within FPUC's electric service area and ensure the installed lighting systems meet or exceed FPUC's efficiency criteria, in alignment with industry standards such as ASHRAE 90.1.

Prior to installation, customers must submit a Lighting Rebate Certificate to FPUC for pre-qualification. After installation, a completed Lighting Rebate Certificate, along with required documentation—such as proof of purchase and installation details—must be submitted. Customers must also allow FPUC representatives to perform on-site inspections to verify compliance with program standards.

All rebate applications and supporting documents must be submitted within one year of the installation date. For the latest information and detailed program guidelines, please refer to FPUC's official rebate documentation.

### *Re-eligibility*

Applicants who have previously participated may reapply five years from the date their incentive was received.

*Rebates*

**Proposed Rebate Structure**

<b>Lighting Upgrade Type</b>	<b>Rebate per kWh Saved</b>
LED Display Lighting (Interior)	\$0.30
LED Linear Fixture Replacement	\$0.16
LED Canopy Lighting (Exterior)	\$0.15
LED Parking Lighting	\$0.13
Indoor Agriculture LED Grow Lights	\$0.12
Refrigerated Display Case LED Lighting	\$0.08
LED Exterior Wall Packs	\$0.04
LED High Bay Lighting	\$0.04
Ceiling Mounted Occupancy Sensors	\$0.02

**Application Examples**

- **LED Display Lighting (Interior):** A system saving 3,448 kWh annually would qualify for a rebate of approximately \$1,034.
- **LED Linear Fixture Replacement:** A system saving 202 kWh annually would be eligible for a rebate of about \$32.
- **LED Canopy Lighting (Exterior):** A system saving 529 kWh annually would receive a rebate of approximately \$79.

*Program Procedures*

Commercial lighting contractors must submit rebate request forms to FPUC within 120 days of project completion. Contractors are responsible for certifying that the installed equipment complies with program standards and providing details of both the replaced and new lighting systems. The form must include the contractor's signature to specify the rebate type, the customer's signature to confirm installation and verify the incentive recipient's name and correct mailing address. A receipt for the installation must also be included with the submission.

Rebate payments will be issued only after FPUC reviews and approves the request. Once approved, FPUC's rebate processing contractor will mail an FPUC Visa gift card (or a check, if applicable) via First-Class mail to the customer or contractor within 30 business days. Dealer rebates will be paid by check within 30 business days of rebate approval.

*Savings Verification*

FPUC conducts follow-up surveys with customers after program participation to collect data for a thorough evaluation of the program's effectiveness. Reporting will comply with Rule 25-17.0021(5) of the Florida Administrative Code, and associated expenses will be included in the ECCR True-Up and Projection filings.