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Public Service Commission

COMMISSION
CLERK

December 9, 2010

Steven R. Griffin
P.O. Box 12950
Pensacola, Florida 32591-2950

STAFF'S FIFTH DATA REQUEST

Re: Docket No. 100154-EG - Petition for approval of demand-side management plan of Gulf Power Company

Dear Mr. Griffin:

By this letter, the Commission staff requests that Gulf Power Company (Gulf or Company) provide responses to the following data requests within (fourteen) 14 days.

General

1. How did Gulf determine the proportion of the rebate dollars to allocate to each program?
2. How much money will be available for rebates in 2011, and what is the planned date that customers can apply for rebates? Please provide breakdowns for each program.
3. Please explain whether and how administrative and marketing costs for each pilot program will be counted against the annual incentive cap for each pilot program.
4.
 - a. Please explain whether administrative and marketing costs for the solar pilot programs will be commingled with similar costs of other demand-side management programs and recovered through "Common Expenses" in the Energy Conservation Cost Recovery Clause.
 - b. Gulf has stated that the IT costs for the pilot programs will diminish over time. Please provide yearly expenditures for the IT costs described in the DSM plan.
 - c. As the IT costs fall, how will that money be re-allocated?
5.
 - a. Please explain how Gulf will manage the requests for rebates that exceed the amount of rebates available in a given year.

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- b. Will customers who have applied to participate in a program whose funds have been exhausted retain their place in the queue for the next year when funds become available?
 - c. How will customers/installers be informed about the remaining funds available?
6. If upgrades to the grid are required for the interconnection of a photovoltaic system that will receive a solar rebate, who will be responsible for the costs?
7. How will the company treat any excess rebate funds from a program year?
8.
 - a. Please explain why a participating customer must have an energy audit after the application for the rebate.
 - b. Please explain whether Gulf will require a participating customer to have an audit, even if an audit has been done within the year previous to their rebate application.
 - c. Please explain whether customers will schedule audits when making reservations for rebates.
 - d. Please explain whether the audit must be completed before Gulf approves the application.
 - e. Would exempting customers who have had an energy audit within the year previous to their rebate application negatively impact the pilot programs or the company and its customers?
9. Does Gulf intend to allocate audit costs required for rebates to the pilot program costs?
10. How will Gulf verify final installation and adherence to program standards? Will all systems have on-site company inspections?
11. Please explain who will have ownership of renewable energy credits for each of the pilot programs.
12. Please explain how excess money within a program will be treated if money has been exhausted within another program in a single year.
13. Please explain what obligations will be passed to the next owner of a system that has received rebates. For example, renewable energy credits, access to the system, data from the system.

Solar Photovoltaic

14. Please explain why the equipment and installation specifications do not reference Rule 25-6.065, Florida Administrative Code, regarding interconnection and net metering of customer-owned renewable generation.

15. Please explain whether the program participation standards should require the customer to sign a standard interconnection agreement and participate in net metering pursuant to Rule 25-6.065, Florida Administrative Code.
16. Please explain the justification of the 2 kW minimum rating for residential photovoltaic systems.
17. Please define “premise” and “customer” as used in the incentive section of the Solar PV Program standards.
 - a. Will a company or a customer with multiple properties and separate meters be able to receive rebates for multiple locations?
 - b. Would a customer be unable to receive a rebate if someone else at their premise received a rebate even if they had separate accounts, for example, customers of a strip mall or a business park?
18. Why is Florida Solar Energy Center certification not required for photovoltaic systems?

Solar Thermal Water Heating

19. Please explain why Florida Solar Energy Center certification and approval of solar thermal systems is a prerequisite for participating in the Solar Thermal Water Heating pilot program.
20.
 - a. Please explain the justification for having the customer schedule the energy audit after the application for the rebate.
 - b. Will the company re-audit customers who have recently had an audit?
 - c. How would the program be affected by having the 90 day clock start with the energy audit?
21. The program standards for the Solar Thermal Water Heating Program state that “an eligible solar thermal water heating system may qualify to receive a \$1,000 maximum incentive.”
 - a. Please explain whether rebates will be \$1,000 per installation?
 - b. If not, please provide the calculation that will be used to determine the rebate.
 - c. What will the minimum rebate be?

Solar for Schools

22. Will operations and maintenance costs for photovoltaic systems installed on schools be recovered from the pilot program’s annual incentive budget? If not, please explain how such

- costs will be recovered or whether the school will be responsible for operation and maintenance.
23. Please define “competitive criteria” as used in the eligibility section of the Solar for Schools pilot program? Please provide the competitive criteria.
 24.
 - a. Who will make the decision to add battery back-up to the installation?
 - b. What criteria will be used in making the decision?
 - c. Will all systems get battery back-up?
 25. Will photovoltaic systems installed in the Solar for Schools Pilot Program comply with Rule 25-6.065, F.A.C.? If so, please explain whether application fees and costs associated with the interconnection will be included in the incentive.
 26. Please explain who will own the renewable energy credits associated with the energy generated by systems installed in the Solar for Schools Pilot Program.
 27. Please explain if the company will be participating in the Sun Smart Schools program, administered by the Florida Solar Energy Center.
 - a. If so, explain whether the Solar for Schools pilot program funds will be used to supplement funding of the planned projects in the Sun Smart Schools program or to fund additional projects.
 - b. If so, please explain if the company plans to coordinate the selection of schools with the Sun Smart Schools program.

Solar Water Heating for Low-Income Residential Customers

28. Please identify the entity that approves the non-profit builders/agencies.
 29. Please provide a list of the non-profit builders/agencies.
 30. Will the program provide for a standard capacity solar water heating system for each installation? If so, please provide the capacity, in gallons per hour. If not, please explain why a standard capacity system will not be used.
 31. Please explain the requirement that a home have a minimum of 4 residents.
 32. What percentage of household hot water use is the program targeting?
 33. Why is Florida Solar Energy Center certification and approval of solar water heating systems a prerequisite for participating in the Solar Thermal Water Heating for Low Income Housing program?
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Data Collection

34. Please explain how Gulf will measure and verify energy production and savings from devices funded through the pilot programs.
35. Please explain how Gulf will determine cost effectiveness.
36. Please explain what criteria Gulf plans to use to determine if the pilot program has been successful.
37. Does Gulf plan to collect data from the solar devices installed through the pilot programs?
 - a. If so, what is Gulf's plan for presenting the data to the FPSC?
 - b. If not, please explain.
38. Please explain what access Gulf will have to systems to gather data for the pilot programs.

Please file the original and five copies of the requested information by Thursday, December 23, 2010, with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6856 if you have any questions.

Sincerely,



Lawrence D. Harris
Senior Attorney
Office of the General Counsel

LDH/gdr

cc: Office of Commission Clerk
George Cavros
Suzanne Brownless
Rick D. Chamberlain