

AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

April 2, 2014

VIA: ELECTRONIC FILING

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850


Re: Commission review of numeric conservation goals
(Tampa Electric Company); FPSC Docket No. 130201-EI

Dear Ms. Stauffer:

Attached for filing in the above docket, on behalf of Tampa Electric Company, is the Prepared Direct Testimony and Exhibit HTB-1 of Howard T. Bryant.

Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

JDB/pp
Enclosure

cc: All Parties of Record (w/enc.)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Prepared Direct Testimony and Exhibit, filed on behalf of Tampa Electric Company, has been furnished electronically this 2nd day of April 2014 to the following:

Ms. Shalonda Hopkins
Mr. Charles Murphy
Ms. Theresa Tan
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
shopkins@psc.state.fl.us
cmurphy@psc.state.fl.us
ltan@psc.state.fl.us

Mr. John Butler
Ms. Jessica Cano
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408
John.Butler@FPL.com
Jessica.Cano@fpl.com

Mr. Kevin Donaldson
Principal Attorney
Florida Power & Light Company
4200 West Flagler Street
Miami, FL 33134
Kevin.Donaldson@fpl.com

Mr. Matthew R. Bernier
Ms. Dianne Triplett
Duke Energy Florida, Inc.
106 East College Avenue, Suite 800
Tallahassee, FL 32301-7740
matthew.bernier@duke-energy.com
dianne.triplett@duke-energy.com

Mr. Robert L. McGee, Jr.
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0780
rlmcgee@southernco.com

Mr. Steven L. Hall
Senior Attorney
Florida Department of Agriculture and
Consumer Services
Office of General Counsel
407 South Calhoun Street, Suite 520
Tallahassee, FL 32399
Steven.Hall@FreshFromFlorida.com

Ms. Paula K. Brown, Manager
Regulatory Coordination
Regulatory Affairs
Tampa Electric Company
P. O. Box 111
Tampa, FL 33601
Regdept@tecoenergy.com

Mr. P. G. Para
JEA
21 West Church Street, Tower 16
Jacksonville FL 32202-3158
parapg@jea.com

Ms. Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

Ms. Cheryl M. Martin
Florida Public Utilities Company
1641 Worthington Road, Suite 220
West Palm Beach, FL 33409-6703
cmmartin@fpuc.com

Mr. W. Christopher Browder
Orlando Utilities Commission
P. O. Box 3193
Orlando, FL 32802-3193
cbrowder@ouc.com

Ms. Alisa Coe
Mr. David G. Guest
Attorneys for SACE
Earthjustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, FL 32302
acoe@earthjustice.org
dguest@earthjustice.org

Mr. George Carvos
Southern Alliance for Clean Energy
120 E. Oakland Park Blvd., #105
Fort Lauderdale, FL 33334
george@cavros-law.com

Mr. Jon C. Moyle, Jr.
Ms. Karen Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Mr. James W. Brew
Mr. F. Alvin Taylor
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007-5201
jbrew@bbrslaw.com
ataylor@bbrslaw.com

Ms. Diana Csank
Associate Attorney
Sierra Club
50 F St. NW, 8th Floor
Washington, DC 20001
Diana.Csank@sierraclub.org

Mr. Gary V. Perko
Ms. Brooke E. Lewis
Hopping Green & Sams, P.A.
Post Office Box 6526
Tallahassee, FL 32314
gperko@hgslaw.com
blewis@hgslaw.com

Mr. Robert Scheffel Wright
Mr. John T. LaVia, III
Gardner, Bist, Wiener, Wadsworth,
Bowden, Bush, Dee, LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, FL 32308
Schef@gbwlegal.com
Jlavia@gbwlegal.com



ATTORNEY



BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 130201-EI
IN RE: COMMISSION REVIEW OF
NUMERIC CONSERVATION GOALS
TAMPA ELECTRIC COMPANY

DIRECT TESTIMONY AND EXHIBIT
OF
HOWARD T. BRYANT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

TABLE OF CONTENTS
PREPARED DIRECT TESTIMONY AND EXHIBIT
OF
HOWARD T BRYANT

TAMPA ELECTRIC'S PROPOSED DSM GOALS	6
OVERALL PROCESS TO DEVELOP DSM SAVINGS	10
TAMPA ELECTRIC'S SPECIFIC PROCESS TO DEVELOP ITS DSM GOALS	16
THE SCREENING PROCESS	20
FOLLOWING THE SCREENING PROCESS	23
ADHERENCE TO F.A.C. RULE AND STATUTORY DSM GOALS SETTING REQUIREMENTS ...	28
OTHER INFORMATION REQUESTED BY THE COMMISSION'S ORDER ESTABLISHING	
PROCEDURE	34
RESULTS OF TAMPA ELECTRIC'S SOLAR PILOT PROGRAMS	37
CONCLUSIONS	55
EXHIBIT	58

1 **BEFORE THE PUBLIC SERVICE COMMISSION**

2 **PREPARED DIRECT TESTIMONY**

3 **OF**

4 **HOWARD T. BRYANT**

5

6 **Q.** Please state your name, address, occupation and employer.

7

8 **A.** My name is Howard T. Bryant. My business address is 702
9 North Franklin Street, Tampa, Florida 33602. I am
10 employed by Tampa Electric Company ("Tampa Electric" or
11 "company") as Manager, Rates in the Regulatory Affairs
12 Department.

13

14 **Q.** Please provide a brief outline of your educational
15 background and business experience.

16

17 **A.** I graduated from the University of Florida in June 1973
18 with a Bachelor of Science degree in Business
19 Administration. I have been employed at Tampa Electric
20 since 1981. My work has included various positions in
21 Customer Service, Energy Conservation Services, Demand
22 Side Management ("DSM") Planning, Energy Management and
23 Forecasting, and Regulatory Affairs. In my current
24 position I am responsible for the company's Energy
25 Conservation Cost Recovery ("ECCR") clause, the

1 Environmental Cost Recovery Clause ("ECRC"), and retail
2 rate design.

3

4 **Q.** Have you previously testified before the Florida Public
5 Service Commission ("Commission")?

6

7 **A.** Yes. I have testified before this Commission on
8 conservation and load management activities, DSM goals
9 setting and DSM plan approval dockets, and other ECCR
10 dockets since 1993, and ECRC activities and dockets since
11 2001.

12

13 **Q.** What is the purpose of your testimony in this proceeding?

14

15 **A.** The purpose of my testimony is to present, for Commission
16 review and approval, Tampa Electric's proposed numerical
17 DSM goals for 2015-2024. Tampa Electric's proposed goals
18 are based upon the analytical work performed by the
19 company and which was done in concert with the other
20 Florida Energy Efficiency and Conservation Act ("FEECA")
21 utilities. As such, the work updates and builds upon the
22 most recent technical potential constructed by Itron,
23 Inc. for the 2010-2019 DSM goals proceeding for FEECA
24 utilities. The goals are separated into summer demand,
25 winter demand and annual energy components for both

1 residential and commercial/industrial sectors. In
2 support of the proposed DSM goals, my testimony will
3 demonstrate that the process Tampa Electric utilized to
4 establish its reasonably achievable, cost-effective goals
5 comports with the requirements of Rule 25-17.0021,
6 Florida Administrative Code ("F.A.C.").

7
8 In addition, my testimony addresses the renewable
9 technology pilot programs that were required by the
10 Commission in Docket No. 080409-EG. The results of the
11 pilot programs are provided, and based on those results;
12 my testimony supports the discontinuation of any future
13 expenditures on these renewable technologies through the
14 ECCR Clause until such time as they may become
15 cost-effective.

16
17 **Q.** Have you prepared an exhibit in support of your
18 testimony?

19
20 **A.** Yes. I have prepared an exhibit entitled, "Exhibit of
21 Howard T. Bryant." It consists of seven documents and
22 has been identified as Exhibit No. _____ (HTB-1).
23 Document No. 1 contains Tampa Electric's proposed DSM
24 goals for 2015-2024; Document No. 2 provides the
25 comprehensive DSM measure list utilized in this

1 proceeding; Document No. 3 provides the Technical
2 Potential Study update process; Document No. 4 contains
3 Tampa Electric's avoided cost data used for
4 cost-effectiveness evaluations; Document No. 5 provides
5 the 2015-2024 estimated annual DSM achievable potential
6 for the RIM and TRC tests; Document No. 6 provides the
7 DSM economic potential cost-effectiveness sensitivity
8 analyses; and Document No. 7 provides the 2015-2024
9 residential bill impacts for the rate impact measure
10 ("RIM") test and total resource cost ("TRC") test
11 portfolios.

12
13 **TAMPA ELECTRIC'S PROPOSED DSM GOALS**

14
15 **Q.** What overall DSM goals are appropriate and reasonably
16 achievable for Tampa Electric for the period 2015-2024?

17
18 **A.** The appropriate and reasonable cumulative DSM goals for
19 Tampa Electric for the period 2015-2024 are segmented
20 into the residential and commercial/industrial sectors
21 and provided at the generator level. For the residential
22 sector, the proposed goals are 25.7 MW of summer demand,
23 61.9 MW of winter demand and 56.9 GWH of annual energy.
24 For the commercial/industrial sector, the proposed goals
25 are 30.6 MW of summer demand, 16.4 MW of winter demand

1 and 87.4 GWH of annual energy. These goals were
2 developed using the Commission-approved
3 cost-effectiveness methodology and are based on the RIM
4 test. Document No. 1 of my exhibit details the
5 incremental and cumulative annual amounts that comprise
6 these goals.

7
8 **Q.** How do Tampa Electric's proposed DSM goals for the
9 upcoming period of 2015-2024 compare to the company's
10 proposed DSM goals for the 2010-2019 period?

11
12 **A.** Tampa Electric's cumulative proposed goals across the
13 residential and commercial/industrial sectors for the
14 2015-2024 period are 56.3 MW of summer demand, 78.3 MW of
15 winter demand and 144.3 GWH of annual energy. The total
16 cumulative goals at the generator level proposed for the
17 2010-2019 period was 81.8 MW of summer demand, 40.9 MW of
18 winter demand and 201.7 GWH of annual energy.

19
20 **Q.** What are the major drivers that established Tampa
21 Electric's proposed 2015-2024 DSM goals at a lower level
22 than what the company proposed during the last DSM goals
23 setting process?

24
25 **A.** There are several factors impacting the decrease in the

1 company's current proposed goals from those proposed five
2 years ago. These include: 1) overall annual customer
3 growth is much lower as well as the average per customer
4 usage of electricity has decreased thereby deferring the
5 in-service date of the next generating unit in the
6 company's expansion plan used for DSM evaluations, 2)
7 appliance efficiencies have increased from previous
8 levels and thus customer usage is further decreased, 3)
9 cost for utility gas generation has decreased, and 4)
10 several efficiency increases in appliance manufacturing
11 standards have occurred for many baseline measures used
12 for evaluation of potential DSM measures which reduced
13 the available demand and energy savings that could be
14 achieved through DSM.

15
16 **Q.** Do you believe that DSM goals should always be set higher
17 than previously set goals?

18
19 **A.** No, I do not. More is not always better and setting
20 goals too high just for the sake of having higher goals
21 can lead to costly and unfair results for Tampa Electric
22 customers. DSM goals should be set with a clear focus on
23 the costs the utility would have to incur to serve the
24 load that the conservation efforts are reasonably
25 projected to avoid. In addition, the conservation

1 measures selected should minimize rate impacts and avoid
2 cross-subsidization between customers. The Commission
3 has been able to accomplish these objectives in the past
4 through the use of the RIM test (to minimize rate impacts
5 and avoid cross-subsidization), the two-year payback
6 screen to minimize free ridership and a process that
7 focuses on the utility's most recently projected resource
8 needs.

9
10 **Q.** How do Tampa Electric's DSM goals accomplishments compare
11 to other utilities in the nation?

12
13 **A.** Tampa Electric's accomplishments are significantly
14 greater than most other utilities in the U.S. Tampa
15 Electric began its DSM efforts in the late 1970s prior to
16 the 1980 legislative enactment of the Florida Energy
17 Efficiency and Conservation Act ("FEECA"). Since then,
18 the company has aggressively sought Commission approval
19 for numerous DSM programs designed to promote energy
20 efficient technologies and to change customer behavioral
21 patterns such that energy savings occur with minimal
22 effect on customer comfort. Additionally, the company
23 has modified existing DSM programs over time to promote
24 evolving technologies and to maintain program
25 cost-effectiveness.

1 From the inception of Tampa Electric's programs through
2 2013, the company has achieved 723 MW of winter demand
3 reduction, 331 MW of summer demand reduction and 815 GWH
4 of annual energy savings. These peak load reductions
5 have eliminated the need for the equivalent of four 180
6 MW power plants. Of greater significance is the fact
7 that the great preponderance of this accomplishment was
8 achieved without subsidizing or penalizing customers who
9 were not participants. Except for the 2010-2013 period,
10 Tampa Electric achieved this level of reduction by
11 offering only those DSM programs that reduce rates for
12 all customers, both DSM participants and non-participants
13 alike.

14
15 The magnitude of these continuing efforts by Tampa
16 Electric, as well as other utilities in Florida, is
17 demonstrated by the continued high rankings Florida
18 utilities achieve as identified in the data available
19 from the Energy Information Administration of the
20 Department of Energy.

21
22 **OVERALL PROCESS TO DEVELOP DSM SAVINGS**

23
24 **Q.** Please describe the overall process used by Tampa
25 Electric to develop its proposed DSM savings.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A. Tampa Electric's process to establish its proposed 2015-2024 DSM goals was strategically guided by two specific items that gave clear direction for DSM goals development and the ultimate filing requirements for this proceeding. First, a Commission Staff workshop occurred on June 17, 2013 where general direction was given by Staff as to how to initiate the current DSM goals setting process with regard to the Itron Technical Potential Study for each utility developed in the last goals proceeding. Second was the Commission's Order Establishing Procedure ("OEP") dated August 19, 2013.

The strong link between the June 17 workshop and the OEP is noted in the OEP. The OEP states that, "On June 17, 2013, staff conducted a meeting with utilities and interested parties to discuss the numeric goals proceeding. The parties agreed that the Technical Potential Study used in the previous numeric goals proceeding, Docket No. 080407-EG - 080412-EG, should be updated by each utility on or about September 30, 2013." Therefore, with agreement among parties and a recent, robust Technical Potential Study in hand, the FEECA utilities embarked on a comprehensive exercise to perform the update function in a consistent manner. At the

1 completion of the update and evaluation process, each
2 utility was able to determine its proposed DSM goals for
3 the 2015-2024 period.

4
5 **Q.** Why was an update to the previous Itron Technical
6 Potential Study appropriate for this proceeding?

7
8 **A.** Updating a previous Technical Potential Study has been a
9 practice utilized by this Commission in the past and has
10 occurred when the foundational data in the previous study
11 is still deemed appropriate. Furthermore, the utilities
12 contacted Itron for advice on the appropriateness of
13 conducting a comprehensive technical potential study so
14 close in time to the last study. Itron experts advised
15 that the value to be gained by conducting a full,
16 comprehensive study versus updating a less-than-stale
17 previous study would not be a wise use of funding. From
18 their experience, they felt the previous study was still
19 foundationally solid, and once updated by the capable
20 utilities of Florida, would provide a useful and adequate
21 tool for DSM goals setting. The end result would be
22 consistency among the utilities, refreshed data with
23 measure relationships maintained within sectors and any
24 new measures added appropriately.

25

1 **Q.** How did the FEECA utilities initiate the update process
2 for the previous Technical Potential Study?

3
4 **A.** To initiate the Technical Potential Study update process,
5 the FEECA utilities sought input from interested parties
6 on any new DSM measures that would be appropriate for
7 inclusion in the current update process. The utilities
8 also examined their own internal resources for new
9 measures. For both the interested parties and the
10 utilities, it was requested that any new measure meet two
11 criteria: 1) the measure must be commercially available
12 in the Florida marketplace, and 2) the assumptions for
13 cost and savings potential must be Florida climate
14 specific. In that manner, any new measure added to the
15 evaluation process would be consistent in nature to the
16 measures already contained in the previous Itron DSM
17 measure data sets.

18
19 **Q.** Please identify the comprehensive DSM measure list
20 developed for the 2015-2024 DSM goals setting process.

21
22 **A.** Tampa Electric's comprehensive DSM measure list developed
23 by input from all collaborative members was comprised of
24 63 residential sector measures, 92 commercial sector
25 measures, and 119 industrial sector measures for a

1 combined total of 274 DSM measures. For residential, the
2 measures were applied to building vintages in the single
3 family, multi-family and mobile home building types.
4 Commercially, the measures were applied to building
5 vintages in the college, food store, hospital, office,
6 lodging, restaurant, retail, school, warehouse, other
7 health care and miscellaneous building types. For
8 industrial, the measures were applied to building
9 vintages in the food processing, textiles, lumber,
10 paper-pulp, printing, chemicals, petroleum,
11 rubber-plastics, stone-clay-glass, primary metals,
12 fabrication metals, industrial machinery, electronics,
13 transportation equipment, instruments and miscellaneous
14 building types. When the comprehensive DSM measure list
15 was applied to the various building types within each
16 sector, over 3,300 specific DSM measure applications were
17 developed for evaluation. Document No. 2 of my exhibit
18 provides Tampa Electric's comprehensive DSM measure list.

19
20 **Q.** What were the new measures added to the current
21 evaluation process?

22
23 **A.** Several new measures were added by the FEECA utilities.
24 These measures are specifically separated and identified
25 in the residential, commercial and industrial measure

1 lists provided in Document No. 2 of my exhibit. The
2 FEECA utilities did not receive any new measures from
3 interested parties in the format requested by the
4 deadline established.

5
6 **Q.** In addition to new measures added for evaluation, what
7 other adjustments were made to the evaluation process?

8
9 **A.** Other adjustments made to the evaluation process included
10 adjusting for baseline measure changes due to building
11 codes and manufacturing product standards. In these
12 cases, some baseline measures were removed and new
13 baselines were established. Those measures removed have
14 been identified in the residential, commercial and
15 industrial measure lists provided in Document No. 2 of my
16 exhibit. Finally, adjustments were made for program
17 participation and customer growth since the last study.

18
19 **Q.** What were the steps taken to update the Technical
20 Potential Study previously completed by Itron?

21
22 **A.** The steps taken to update the previous study are provided
23 in Document No. 3 of my exhibit. A flowchart with
24 explanations of the process as well as a list of terms
25 and their definitions is provided.

1 Q. Has the collaborative process among the FEECA utilities
2 brought value to the overall DSM goals setting process?

3

4 A. Yes. The process has provided consistency, established
5 accurate baselines to begin the new period of goals
6 setting and included new measures not evaluated in the
7 previous proceeding.

8

9 **TAMPA ELECTRIC'S SPECIFIC PROCESS TO DEVELOP ITS DSM GOALS**

10

11 Q. What was Tampa Electric's first step in developing its
12 specific DSM goals?

13

14 A. Tampa Electric's first step in developing its specific
15 DSM goals was to update its technical potential in the
16 manner detailed in Document No. 3 of my exhibit. The
17 technical potential is the total amount of DSM
18 technically feasible in the company's service area based
19 on the comprehensive DSM measure list. As stated in
20 Itron's final report for Tampa Electric from the last DSM
21 goals proceeding, the technical potential is a
22 theoretical construct that represents the upper bound of
23 energy efficiency, demand response and photovoltaic
24 ("PV") potential from a technical feasibility sense,
25 regardless of cost or acceptability to customers.

1 Specifically, the technical potential does not account
2 for other real-world constraints such as product
3 availability, contractor/vendor capacity, cost-
4 effectiveness, or customer preferences. Furthermore, the
5 technical potential estimates for energy efficiency,
6 demand response, and PV are not additive. This is due to
7 the interactive effect of certain measures on end uses.
8 With this backdrop, the energy efficiency demand and
9 energy values represented by the updated technical
10 potential are 1,306 MW of summer demand, 823 MW of winter
11 demand and 5,961 GWH of annual energy. The demand
12 response demand reduction values represented by the
13 technical potential are 502 MW of summer demand and 430
14 MW of winter demand. Finally, the PV demand and energy
15 values represented by the technical potential are 2,929
16 MW of summer demand, 447 MW of winter demand and 7,892
17 GWH of annual energy.

18
19 **Q.** Once the technical potential was established, what was
20 Tampa Electric's next step?

21
22 **A.** The next step involved initiating Tampa Electric's
23 integrated resource planning ("IRP") process. The
24 company's IRP process has been utilized and approved in
25 all previous DSM goals setting proceedings and is clearly

1 delineated in the company's annual Ten-Year Site Plan
2 filing. The IRP process began by establishing Tampa
3 Electric's supply-only resource plan for the base years
4 of 2015 through 2024. The supply-only resource plan was
5 developed by having no additional DSM impacting the
6 company's forecast after 2014. In so doing, the avoided
7 unit for the upcoming cost-effectiveness analyses was
8 identified. Document No. 4 of my exhibit provides the
9 detail of this avoided unit.

10
11 **Q.** Once the avoided unit information was determined, what
12 was the next step in the process?

13
14 **A.** The next step for Tampa Electric was to establish its
15 economic potential. This process began with the
16 evaluation of the aforementioned 3,322 specific DSM
17 measure applications contained in the technical potential
18 that were spread across the various sectors and building
19 types. The company developed its economic potential by
20 utilizing the Commission's approved cost-effectiveness
21 tests, namely, the RIM and TRC tests. When calculating
22 the RIM test, only lost revenues were considered on the
23 cost side of the equation. For the TRC test, only the
24 customer's equipment cost was considered on the cost side
25 of the equation. For both the RIM and TRC tests, the

1 benefits were comprised of avoided supply side costs that
2 included the generator, transmission and distribution,
3 and fuel costs.

4
5 Tampa Electric's economic potential established under the
6 RIM test evaluation resulted in 556 individual
7 evaluations remaining from the original list. The
8 resulting demand and energy values of the economic
9 potential were 1,090 MW of summer demand, 949 MW of
10 winter demand and 3,516 GWH of annual energy.

11
12 Tampa Electric's economic potential established under the
13 TRC test evaluation resulted in 878 individual
14 evaluations remaining from the original list. The
15 resulting demand and energy values of the economic
16 potential were 1,157 MW of summer demand, 876 MW of
17 winter demand and 4,495 GWH of annual energy.

18
19 **Q.** After the RIM and TRC economic potentials were
20 determined, what was the next step in Tampa Electric's
21 process?

22
23 **A.** The next step in Tampa Electric's process was to perform
24 a systematic analysis to determine the appropriate
25 incentive for each measure under the RIM and TRC economic

1 potential scenarios. Since this step required the
2 identification of measures that could cost-effectively
3 handle the application of incentives, it was necessary to
4 employ a series of screenings such that when completed,
5 the appropriate measures for DSM goals establishment
6 would remain.

7
8 **THE SCREENING PROCESS**

9
10 **Q.** Please describe the steps involved in the screening
11 process.

12
13 **A.** The first step in the screening process was to screen
14 those measures out of the RIM and TRC economic potential
15 scenarios by evaluating their cost-effectiveness for the
16 inclusion of administrative costs but with no incentives.
17 Tampa Electric developed the administrative costs through
18 its experience with the same or similar measures
19 contained in existing DSM programs. Under the RIM test
20 evaluation, the screening resulted in 556 individual
21 evaluations remaining with summer demand savings of 1,090
22 MW, winter demand savings of 949 MW, and annual energy
23 savings of 3,516 GWH. Under the TRC test evaluation,
24 this screening resulted in 878 individual evaluations
25 remaining with summer demand savings of 1,157 MW, winter

1 demand savings of 876 MW, and annual energy savings of
2 4,495 GWH. The demand and energy savings for this
3 screening exercise is the same as the economic potential
4 results previously identified due to the diminished
5 impact of administrative costs.

6
7 The second step in the screening process was to screen
8 those measures out of the RIM and TRC potential scenarios
9 for free ridership. The term "free ridership" describes
10 a situation where a customer willingly accepts a rebate
11 or other type of incentive to purchase goods or services
12 that the customer would have purchased anyway, without
13 the rebate or other incentive, because of the cost-
14 effectiveness of the goods or services purchased.
15 Furthermore, Rule 25-17.0021, F.A.C., requires the
16 minimization of free riders in the setting of DSM goals.
17 This requirement was accomplished through the application
18 of a longstanding Commission recognized practice,
19 initially approved in the 1994 DSM goals proceeding.
20 There, the Commission approved the use of a participant
21 payback of two years or less without a utility incentive.
22 The two-year or less period of time is sufficient
23 motivation for a customer's natural, self-serving
24 adoption of the DSM measure. Simplistically, it was
25 thought that Tampa Electric, and ultimately its

1 customers, should not pay specific customers to do what
2 they would do on their own without an incentive.
3 Therefore, the two-year payback criterion is the
4 appropriate means to apply to minimize free ridership as
5 required by Rule.

6
7 The execution of this screening level for free ridership
8 required not only the use of the RIM and TRC tests, but
9 also the Participants' test in conjunction with each. By
10 utilizing this free ridership screen, 417 individual
11 evaluations remained qualified under the RIM and
12 Participants' tests evaluation and had summer demand
13 savings of 963 MW, winter demand savings of 903 MW, and
14 annual energy savings of 2,933 GWH. Under the TRC and
15 Participants' tests evaluation, 551 individual
16 evaluations remained qualified with 786 MW of summer
17 demand savings, 764 MW of winter demand savings, and
18 3,362 GWH of annual energy savings.

19
20 The third step in the screening process was the
21 development of the incentive level to be applied to the
22 remaining measures. For this step, Tampa Electric chose
23 an incentive level that would maximize the achievable
24 potential. This was accomplished by selecting the
25 incentive level that established measure payback at the

1 two-year payback level or as close to that level as
2 possible while maintaining cost-effectiveness. This
3 incentive selection process was completed for both RIM
4 and TRC scenarios and provided the largest achievable
5 potential for each scenario. Again, as this process was
6 applied, cost-effectiveness was maintained under the RIM
7 and TRC methodologies and in conjunction with the
8 Participants' test.

9
10 **FOLLOWING THE SCREENING PROCESS**

11
12 **Q.** Once the third step in the screening process was
13 completed, what did Tampa Electric do with the results?

14
15 **A.** At the completion of the screening process, the results
16 of the incentive level determination under the RIM and
17 TRC scenarios were evaluated with supply curve adoption
18 modeling to establish the achievable DSM potential under
19 both RIM and TRC scenarios.

20
21 **Q.** What are Tampa Electric's DSM energy efficiency
22 achievable potentials for the 2015-2024 period under the
23 RIM and TRC scenarios?

24
25 **A.** For the 2015-2024 period, Tampa Electric's DSM energy

1 efficiency achievable potentials under the RIM scenario
2 are 35.8 MW of summer demand savings, 52.4 MW of winter
3 demand savings, and 138 GWH of annual energy savings.
4 Under the TRC scenario Tampa Electric's DSM energy
5 efficiency achievable potentials are 65.7 MW of summer
6 demand savings, 71.6 MW of winter demand savings, and
7 262.7 GWH of annual energy savings. These values are
8 stated at the generator level.

9
10 **Q.** Do these DSM achievable potentials include demand
11 response and renewable measures?

12
13 **A.** No. These DSM achievable potentials only account for
14 energy efficiency measures. Tampa Electric evaluated the
15 potentials of demand response and renewable measures
16 separately.

17
18 **Q.** Please describe the method Tampa Electric employed to
19 estimate the achievable potential demand and energy
20 savings from demand response and renewable measures.

21
22 **A.** The achievable potential for demand response was
23 developed in a manner similar to that used for the energy
24 efficiency achievable potential, namely updating the
25 demand response component of the 2009 Itron technical

1 potential. However, no adjustments were necessary for
2 codes and standards and no new measures were identified.
3 Therefore, the updating only required adjustments for
4 customer growth and historical accomplishments since the
5 last technical potential. Based on these adjustments,
6 the associated achievable potential for demand response
7 is 20.5 MW of summer demand savings, 25.9 MW of winter
8 demand savings, and 6.3 GWH of annual energy savings.

9
10 The achievable potential for renewables was developed
11 utilizing data from Tampa Electric's pilot renewable
12 energy programs. Based on the results of the pilot
13 programs, neither solar water heating nor PV measures
14 provided any contribution to the company's achievable
15 potential. Details of the results of the company's pilot
16 renewable programs are addressed later in my testimony.

17
18 **Q.** Based on the estimated achievable potentials for energy
19 efficiency and demand response, what is Tampa Electric's
20 total estimated maximum achievable potential for DSM
21 measures?

22
23 **A.** When the estimated achievable potentials for energy
24 efficiency and demand response are combined, Tampa
25 Electric's total estimated maximum DSM achievable

1 potential for the 2015-2024 period under the RIM scenario
2 is 56.3 MW of summer demand savings, 78.3 MW of winter
3 demand savings, and 144.3 GWH of annual energy savings.
4 Tampa Electric's total estimated maximum achievable
5 potential for the 2015-2024 period under the TRC scenario
6 is 86.2 MW of summer demand savings, 97.5 MW of winter
7 demand savings, and 269.0 GWH of annual energy savings.
8 These are generator level values. Document No. 5 of my
9 exhibit provides the annual and cumulative totals for the
10 RIM and TRC cost-effectiveness scenarios.

11
12 **Q.** What are Tampa Electric's proposed residential and
13 commercial/industrial DSM goals for the 2015-2024 period?
14

15 **A.** For the 2015-2024 period, Tampa Electric's proposed DSM
16 goals for the residential and commercial/industrial
17 sectors are the generator level achievable potential
18 demand and energy results under the RIM maximum incentive
19 scenario. Specifically, the residential sector DSM goals
20 are 25.7 MW of summer demand savings, 61.9 MW of winter
21 demand savings, and 56.9 GWH of annual energy savings.
22 The commercial/industrial sector DSM goals are 30.6 MW of
23 summer demand savings, 16.4 MW of winter demand savings,
24 and 87.4 GWH of annual energy savings. Document No. 1 of
25 my exhibit provides the annual and cumulative amounts for

1 both sectors for the 2015-2024 period.

2
3 **Q.** What is the cost-effectiveness basis for Tampa Electric's
4 proposed DSM goals?

5
6 **A.** The cost-effectiveness basis for Tampa Electric's goals
7 is the RIM test in conjunction with the Participants'
8 test. The RIM test, when used in tandem with the
9 Participants' test, provides a cost-effective, fair,
10 reasonable and equitable determination of DSM
11 expenditures for both the participants and the non-
12 participants. The RIM test puts the least amount of
13 upward pressure on rates while allowing for significant
14 accomplishments of DSM measure deployment. Furthermore,
15 the RIM test does not promote cross-subsidization among
16 participants and non-participants. Finally, history
17 indicates that this Commission's longstanding decisions
18 in the past to approve a utility's DSM goals based on the
19 RIM test have not hindered the DSM performance of the
20 Florida utilities relative to other utilities in the
21 industry. Based on these results and the fairness of the
22 methodology, Tampa Electric believes its DSM goals for
23 the 2015-2024 period should be established on the RIM
24 test basis.

25

1 **ADHERENCE TO F.A.C. RULE AND STATUTORY DSM GOALS SETTING**
2 **REQUIREMENTS**

3
4 **Q.** Does the evaluation process utilized by Tampa Electric to
5 establish its proposed DSM goals for the 2015-2024 period
6 address the requirements of Rule 25-17.0021, F.A.C.?

7
8 **A.** Yes. The Rule requires a utility to 1) project its
9 proposed DSM goals in both the residential and
10 commercial/industrial sectors, 2) give consideration to
11 measures applicable for new and existing construction, 3)
12 ensure that major end-use categories specified in the
13 Rule be assessed, and 4) consider such things as
14 overlapping measures, appliance efficiency standards,
15 interactions with building codes, free riders, rebound
16 effects and the utility's latest monitoring and
17 evaluation data. Therefore, the comprehensive DSM
18 measure list developed by the FEECA utilities, the
19 company's previous utilization and now current update of
20 Itron's Technical Potential for Electric Energy and Peak
21 Demand savings for Tampa Electric, and the company's
22 overall evaluation process from its updated technical
23 potential to its proposed DSM goals for the 2015-2024
24 period comport with Rule 25-17.0021, F.A.C.

25

1 Q. Has Tampa Electric provided an adequate assessment of the
2 full technical potential of all available demand-side
3 conservation and efficiency measures, demand response and
4 demand-side renewable energy systems?

5
6 A. Yes. Tampa Electric, in conjunction with the other FEECA
7 utilities, developed a comprehensive DSM measure list.
8 Subsequently, the company conducted an adequate
9 assessment of the full technical potential of all
10 available demand-side conservation and efficiency
11 measures, demand response and renewable energy systems.
12 A total of 274 measures, including energy efficiency,
13 demand response and renewable energy measures were
14 identified and evaluated by the company.

15
16 Q. How has Tampa Electric incorporated supply-side
17 efficiencies into its planning process?

18
19 A. Supply-side efficiencies include improvements in
20 generation, transmission and distribution. Therefore,
21 Tampa Electric's motivation to deliver electric service
22 to its customers in the most economically efficient
23 manner possible makes executing supply-side efficiencies
24 a naturally occurring result. A review of Tampa
25 Electric's plans for supply-side endeavors is an inherent

1 element of the company's annual Ten-Year Site Plan which
2 is routinely reviewed by this Commission. Furthermore,
3 both supply-side efficiency and conservation resources
4 are analyzed in every need determination for new sources
5 of generation. When Tampa Electric selects its avoided
6 supply-side costs for utilization in DSM cost-
7 effectiveness evaluations, it is selecting resources that
8 have previously been reviewed and determined to be
9 efficient. Of further note is the fact that while
10 efficiency improvements in supply-side resources are
11 important, these improvements have a tendency to reduce
12 potential savings available through DSM activity.

13
14 **Q.** Has Tampa Electric provided an adequate assessment of the
15 achievable potential of all available demand-side
16 conservation and efficiency measures, including demand-
17 side renewable energy systems?

18
19 **A.** Yes. Tampa Electric has conducted an adequate assessment
20 of the full technical, economic and achievable potentials
21 of all available demand-side conservation and efficiency
22 measures including renewable energy systems. The company
23 employed a reasonable approach to identifying
24 administrative costs and incentives for the measures and
25 evaluated the measures against the appropriate supply-

1 side avoided cost data.

2

3 **Q.** Should the Commission establish separate goals for
4 demand-side renewable energy systems?

5

6 **A.** No. Tampa Electric evaluated renewable technologies as
7 an integral part of its overall DSM measure evaluation
8 process. Data for those evaluations was taken from
9 actual field data collected from the company's
10 residential and commercial pilot renewable energy
11 programs that were initiated in late 2010 by Commission
12 order from the last DSM goals proceeding. At the
13 conclusion of that proceeding, the Commission
14 acknowledged that none of the renewable technologies were
15 cost-effective under any test; however, utilities were
16 ordered to conduct pilot programs with expenditure caps
17 up until the next DSM goals setting proceeding.

18

19 Tampa Electric is now at the next DSM goals setting
20 proceeding having a wealth of information from its
21 renewable pilot programs. A full narration concerning
22 these pilot programs can be found later in my testimony,
23 but program results clearly indicate cost-effectiveness
24 has not been achieved under any test. Furthermore, any
25 ongoing expenditures on these types of programs will only

1 serve to continue to unduly raise rates on customers and
2 further exacerbate subsidy payments among customers -
3 something this Commission's has strived not to do through
4 applying appropriate cost allocations between customer
5 rate classes.

6
7 Of further note is the acknowledgement by this Commission
8 that setting DSM goals at zero is in fact appropriate if
9 no DSM measures were found to be cost-effective.

10
11 At this juncture, the evidence is convincing that
12 renewable technologies are not suitable for inclusion in
13 goals setting. These measures demonstrated non-cost-
14 effectiveness in the previous DSM goals setting
15 proceeding, yet pilot programs were ordered and initiated
16 and have now proven through field experience that they
17 are still not cost-effective. With this Commission
18 having previously concluded that setting goals at zero is
19 appropriate when no measures are cost-effective, the
20 Commission must conclude that zero goals for renewable
21 technologies is now appropriate in this proceeding. To
22 allow for any further expenditure on this renewable
23 activity will only serve to increase rates beyond what is
24 reasonable and continue the inappropriate practice of
25 cross-subsidization among customers.

1 **Q.** Do Tampa Electric's proposed DSM goals adequately reflect
2 the costs and benefits to customers who will participate
3 in programs developed to promote DSM measures?
4

5 **A.** Yes. Through Tampa Electric's efforts to refresh the
6 work Itron conducted for the previous DSM goals setting
7 proceeding, and with local market input relative to
8 baselines and incremental equipment costs supplied to
9 Tampa Electric, the company's proposed RIM-based DSM
10 goals adequately reflect the costs and benefits to
11 customers who will participate in programs developed to
12 promote DSM measures.
13

14 **Q.** Do Tampa Electric's proposed DSM goals adequately reflect
15 the costs and benefits to the general body of ratepayers
16 as a whole, including utility incentives and participant
17 contributions?
18

19 **A.** Yes. The surest way to adequately reflect the costs and
20 benefits to the general body of ratepayers as a whole
21 without subsidization within or across rate classes is to
22 employ the use of the RIM test for DSM goals setting and
23 program approval. Since the inception of DSM in Florida,
24 this Commission has a longstanding practice of utilizing
25 the RIM test to provide fair, equitable and reasonable

1 treatment for all ratepayers while minimizing overall
2 rate impacts of DSM expenditures. Tampa Electric
3 strongly encourages the Commission to continue this
4 practice so as to establish meaningful DSM goals while
5 minimizing overall rate impacts.

6
7 **OTHER INFORMATION REQUESTED BY THE COMMISSION'S ORDER**
8 **ESTABLISHING PROCEDURE**

9
10 **Q.** Please describe how Tampa Electric conducted the
11 sensitivity analyses requested by the Commission's OEP.

12
13 **A.** Tampa Electric's sensitivity analyses were conducted on
14 the RIM and TRC economic potentials with regard to the
15 following factors: 1) higher fuel costs, 2) lower fuel
16 costs, 3) shorter free-ridership exclusion period, and 4)
17 longer free-ridership exclusion period. Specifically,
18 the fuel cost was varied in a similar manner as to Tampa
19 Electric's sensitivity conducted in the fuel docket. The
20 free-ridership exclusion period varied from one year to
21 three years.

22
23 **Q.** For Tampa Electric, please describe the results of the
24 sensitivity analyses when applied to the 2015-2024 RIM
25 and TRC DSM economic potentials.

1 **A.** Tampa Electric's sensitivity analyses on the 2015-2024
2 RIM and TRC DSM economic potentials were conducted by
3 determining the change in four components for both
4 potentials. These components were the total number of
5 individual measures across housing and building types
6 that passed RIM or TRC tests, annual energy, summer
7 demand and winter demand. Document No. 6 provides the
8 detailed results of the analyses.

9
10 Results from the sensitivity analyses are modest at best.
11 From a RIM perspective, the greater variation occurred
12 with summer demand relative to fuel costs. From a TRC
13 perspective, the greater variation occurred with annual
14 energy relative to payback duration.

15
16 **Q.** Should the results of these sensitivity analyses be used
17 in any manner to influence or establish Tampa Electric's
18 DSM goals for the 2015-2024 period?

19
20 **A.** No. Tampa Electric believes the sensitivity analyses
21 simply provide a relative indication as to how cost-
22 effectiveness evaluations may be affected by changes in
23 assumptions. There is no basis to conclude the
24 assumption changes modeled by the company for this
25 sensitivity exercise will in some manner become more

1 plausible than the actual assumptions utilized.

2
3 **Q.** For Tampa Electric, what are the 2015-2024 annual bill
4 impacts on residential customers using 1,200 kWh/month
5 for the projected RIM achievable portfolio and the
6 projected TRC achievable portfolio?

7
8 **A.** To make the determination of the 1,200 kWh/month annual
9 residential bill impact for the 2015-2024 period relative
10 to the RIM and TRC achievable portfolios, Tampa
11 Electric's approach was to provide a total bill estimate
12 that included all of the normal components that comprise
13 a typical residential bill, namely, base rate, recovery
14 clauses and customer charge. Also, the company included
15 the costs for maintaining existing DSM on the company's
16 system. This principally included load management costs
17 associated with maintaining the existing level of load
18 management on the system as well as energy audit costs
19 necessary to continue compliance with Rule 25-17.003,
20 F.A.C. The results of these analyses for the 2015-2024
21 period are contained in Document No. 7 of my exhibit and
22 demonstrate the estimated ten-year total cost for a 1,200
23 kWh/month bill would be \$16,817 for the RIM portfolio and
24 \$16,862 for the TRC portfolio.

25

1 It is important to realize the dollar amounts for the RIM
2 and TRC achievable portfolios are estimates for only one
3 customer's electric bill. A more realistic view is
4 gained by looking at the impact across the company's
5 entire system and thus its entire customer base. The
6 estimated ECCR clause cost to deliver the RIM portfolio
7 for the 2015-2024 period is \$470 million. The estimated
8 ECCR clause cost to deliver the TRC portfolio for the
9 2015-2024 period is \$523 million. Therefore, the TRC
10 portfolio is a \$53 million greater burden for customers.
11 Furthermore, the RIM portfolio, by definition of the RIM
12 test, is cost-effective for both participating and non-
13 participating customers; therefore, there are no losers.
14 However, the TRC portfolio is cost-effective for program
15 participants but not for non-participants. Under the TRC
16 portfolio, non-participants will actually be subsidizing
17 the program participants for their DSM efforts.
18 Therefore, the RIM portfolio is the more cost-effective,
19 less expensive, more reasonable and equitable approach to
20 take in order to provide another resource to assist the
21 company in meeting future system needs.

22
23 **RESULTS OF TAMPA ELECTRIC'S SOLAR PILOT PROGRAMS**

24
25 **Q.** Please describe Tampa Electric's current solar pilot

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

programs.

- A.** Tampa Electric’s solar pilot programs are comprised of four initiatives. These pilot initiatives include PV systems for residential and commercial customers, PV systems for schools, residential solar water heating (“SWH”) and low income SWH.

The PV pilot program for residential and commercial customers provides an incentive of \$2 per watt (\$2,000 per kW) to the customer for PV systems installed on homes and businesses. The maximum incentive per premise is \$20,000.

The pilot PV for schools program is managed in conjunction with the Florida Solar Energy Center (“FSEC”) SunSmart/E-Shelter program. Tampa Electric installs one 10 kW PV system a year on a school in its service area identified as an emergency shelter. The school must meet FSEC E-Shelter program criteria for participation. The PV system includes battery backup and the overall effort includes educational opportunities for teachers and students.

The pilot residential SWH program provides a \$1,000

1 incentive for the installation of a SWH system on a new
2 or existing home.

3
4 Finally, the pilot low income SWH program provides a
5 solar water heating system for new construction low
6 income housing. This effort is managed in conjunction
7 with non-profit building organizations (e.g., Habitat for
8 Humanity) that engage in these types of construction
9 activities. Tampa Electric provides up to five SWH
10 systems per year.

11
12 **Q.** Why were these pilot programs initiated?

13
14 **A.** These pilot programs were initiated as a result of
15 Commission Order No. PSC-09-0855-FOF-EG ("Order"). In
16 that Order, the Commission stated that "...amendments to
17 Section 366.82(2), F.S., require us to establish goals
18 for demand-side renewable energy systems. **None of these**
19 **resources were found to be cost-effective in the**
20 **utilities' analyses.** However, we can meet the intent of
21 the Legislature to place added emphasis on these
22 resources, while protecting ratepayers from undue rate
23 increases by requiring the IOUs to offer renewable
24 programs subject to an expenditure cap. We direct the
25 IOUs to file pilot programs focusing on encouraging solar

1 water heating and solar PV technologies in the DSM
2 program approval proceeding. Expenditures allowed for
3 recovery shall be limited to 10 percent of the average
4 annual recovery through the Energy Conservation Cost
5 Recovery clause in the previous five years...." (Emphasis
6 added)

7
8 Based on that Order, Tampa Electric, along with Florida
9 Power and Light, Duke Energy (at the time Progress
10 Energy), Gulf Power and Florida Public Utilities
11 developed specific pilot renewable programs to meet Order
12 requirements. The Commission approved annual expenditure
13 for these utilities was \$24.5 million annually with Tampa
14 Electric's portion being \$1.5 million annually.

15
16 As stated in the Order, all witnesses who provided
17 testimony on demand-side renewable resources in the
18 proceeding clearly articulated the fact that PV and solar
19 thermal technologies were not cost-effective. That fact
20 was also stated in the Commission's conclusion to the
21 section on Demand-Side Renewable Energy Systems.
22 However, at the time, the Commission construed from the
23 recently adopted legislation that emphasis on these
24 resources was needed and directed the affected utilities
25 to initiate programs for renewable technologies with the

1 annual spending requirements discussed above. Witnesses
2 advocating for this initiative put forth speculation that
3 infusing the market with incentives could lower the
4 overall cost of renewable systems and thereby improve
5 cost-effectiveness. Interestingly, the cost of renewable
6 systems has been declining on a national basis due in no
7 part to the influence from Florida-specific incentives.
8 Further, proponents of this quasi research and
9 development type effort suggested that it would
10 facilitate improvements in each technology's efficient
11 energy production. Based on the results of the pilot
12 programs, efficiency improvements of the technologies
13 were limited at best.

14
15 **Q.** Generally, how have these pilot programs performed since
16 inception?

17
18 **A.** The PV pilot program for residential and commercial
19 sectors has been popular with customers. Customers
20 quickly reserve the incentives offered each year through
21 the company's website. In accordance with program
22 standards, should any funds be reserved but not utilized
23 in the prescribed time period, these funds are again made
24 available to customers during that same year. Based on
25 installed system sizes the company has experienced in

1 this initiative, 60 to 70 incentives have been available
2 each year.

3
4 The pilot PV for schools program was designed to use a
5 portion of the overall renewable initiative annual
6 funding to secure the installation of one PV system per
7 year on qualified schools. The company had 11 schools in
8 its service area that were finalists through FSEC's
9 SunSmart Schools E-Shelter program. Tampa Electric has
10 chosen one school each year based on that school's FSEC
11 E-Shelter qualifications ranking and installed a PV
12 system with battery backup at that location.

13
14 The pilot residential SWH program has experienced modest
15 success. Each year, the incentives made available for
16 SWH systems have been more than the amounts customers
17 applied for and received. Therefore, the company has
18 shifted those unused funds over to the pilot PV program
19 for potential distribution. Annually, Tampa Electric has
20 experienced a maximum of 49 participants in the pilot SWH
21 program.

22
23 The pilot low income SWH program has had marginal
24 success. The number of annual solar water heating
25 installations is solely dependent upon the number of new

1 houses constructed by non-profit organizations. Funding
2 was made available for five installations per year;
3 however, 2012 was the only year where all five systems
4 were installed. Any remaining funds were made available
5 to other pilot renewable initiatives.

6
7
8
9

Q. Please summarize the participation rates for these pilot programs.

10 **A.** The participation rates for these pilot programs are
11 provided in the table below.

12
13
14
15
16
17
18
19
20
21
22
23

<u>Year</u>	<u>PV System</u>	<u>PV for Schools</u>	<u>Res SWH</u>	<u>Low Income SWH</u>
2011	57	1	46	2
	(49 Res 8 Com)			
2012	70	1	25	5
	(63 Res 7 Com)			
2013	65	1	49	3
	(56 Res 9 Com)			

24 **Q.** What costs has Tampa Electric incurred delivering these
25 pilot programs to its service area?

1 **A.** The costs Tampa Electric has incurred delivering these
2 pilot programs to its service area are as follows:

3 2011 - \$671,429

4 2012 - \$1,625,597

5 2013 - \$1,496,697

6

7 **Q.** What are the customer equipment costs for the solar
8 technologies and how has that trended since inception?

9

10 **A.** The annual average customer equipment costs for PV and
11 SWH technologies are provided below:

12

13 **PV:**

14 2011 - \$5,500 per kW

15 2012 - \$4,346 per kW

16 2013 - \$3,419 per kW

17

18 The cost per kW has decreased over time primarily due to
19 the decrease in PV panel pricing. However, Tampa
20 Electric does not believe the incentive program caused
21 this price decrease. As previously stated, PV system
22 costs have been declining on a national basis absent the
23 influence of incentives from Florida utilities.

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

SWH:

- 2011 - \$5,194 per system
- 2012 - \$5,254 per system
- 2013 - \$5,656 per system

The cost for SWH systems has experienced a modest increase over time. The company believes this is primary due to two factors: 1) normal inflationary impacts on materials and labor, and 2) slight variations in system sizes being installed.

Low Income SWH:

- 2011 - \$3,500 per system
- 2012 - \$4,480 per system
- 2013 - \$4,230 per system

The per unit cost for SWH systems installed on new low income housing has risen since the first year, but of interest is the comparison between low income system costs and residential SWH program system costs. Annually, the low income SWH systems, totally funded by renewable initiative dollars, have ranged between \$800 to almost \$1,700 less than the SWH systems receiving incentives through the residential SWH pilot program. However, the SWH system incentive paid to the residential

1 homeowner (\$1,000) tends to bring that system's net cost
2 down to levels somewhat comparable to the low income
3 systems.

4
5 **Q.** For the purpose of cost-effectiveness calculations, what
6 are the demand and energy savings from Tampa Electric's
7 pilot solar programs?

8
9 **A.** The demand and energy savings necessary for the cost-
10 effectiveness determination of each of the pilot programs
11 is provided in the table below.

12

<u>Pilot Program</u>	<u>Summer kW</u>	<u>Winter kW</u>	<u>Annual Energy</u>
14 Residential PV	2.33	1.05	11,236
15 Commercial PV	3.56	1.61	17,188
16 SWH	0.31	0.40	1,730

17

18 **Q.** Based on the demand and energy savings from these solar
19 pilot programs, what are their cost-effectiveness values?

20
21 **A.** The cost-effectiveness values for Tampa Electric's solar
22 pilot programs are determined by calculating the benefit-
23 to-cost ratios of the program offerings as defined by
24 three tests, namely the RIM test, the TRC test and the
25 Participant Test. These tests are specifically

1 identified by Commission Rule 25-17.008, F.A.C. - the
2 same rule and calculation methodology used in setting DSM
3 goals and establishing cost-effective DSM plans. By
4 utilizing these same tests, the "playing field" for all
5 technologies, solar or otherwise, is fair and level. In
6 order to pass these tests, the calculated test values
7 must be greater than 1.0, indicating benefits are greater
8 than costs. The cost-effectiveness values for the solar
9 pilot programs are provided in the table below.

<u>Pilot Program</u>	<u>RIM Value</u>	<u>TRC Value</u>	<u>Participant Value</u>
Residential PV	0.38	0.41	1.20
Commercial PV	0.40	0.39	1.10
SWH	0.56	0.28	0.71

10
11
12
13
14
15
16 **Q.** What do the cost-effectiveness test values for the pilot
17 PV programs mean?

18
19 **A.** The meaning of these cost-effectiveness values is clear
20 and stark. The pilot residential and commercial PV
21 programs do not pass the RIM Test or the TRC Test. Their
22 RIM values are 0.38 and 0.40, respectively, and their TRC
23 values are 0.41 and 0.39, respectively.

24
25 From a RIM Test perspective, this means the total

1 benefits (avoided generation, avoided T&D and fuel) are
2 far too small compared to the costs (incentives, program
3 administration, and lost revenue) associated with
4 delivering these programs.

5
6 From a TRC Test perspective, this means the total
7 benefits (avoided generation, avoided T&D and fuel) are
8 also far too small compared to the program costs (cost of
9 equipment, equipment O&M costs, and program
10 administration) associated with delivering these
11 programs.

12
13 However, the Participant Test values for both the
14 residential and commercial offerings (1.20 and 1.10,
15 respectively) indicate adequate cost-effectiveness, i.e.,
16 the benefits to the participants is greater than the
17 costs; however, this is due to cross-subsidies.
18 Specifically, the non-passing values for both the RIM and
19 TRC Tests demonstrate that participants are being non-
20 cost-effectively subsidized by all other customers.

21
22 **Q.** Please explain why the RIM and TRC Tests have failing
23 values and yet the Participant Test has passing values.

24
25 **A.** The RIM Test has failing values for the residential and

1 commercial programs (0.38 and 0.40, respectively) due to
2 the magnitude of the incentives. At \$2 per watt, the
3 average incentive for residential is \$14,028 and the
4 average incentive for commercial is \$20,000.

5
6 The TRC Test has failing values for the residential and
7 commercial programs (0.41 and 0.39, respectively) due to
8 the high cost of the technology, even though costs have
9 been decreasing over the life of the pilot programs.

10
11 The Participant Test has passing values for the
12 residential and commercial programs due to the high
13 incentives offered as well as currently available tax
14 credits. Over time, the incentive levels offered help
15 the participant recover the investment before the useful
16 life of the equipment has been exhausted. But as
17 previously stated, cross-subsidies are flowing from non-
18 participants to the participants without sufficient,
19 cost-effective benefits being received by the non-
20 participants.

21
22 **Q.** Did Tampa Electric perform sensitivities on the various
23 tests to determine what combination of incentives and
24 technology costs, if any, could result in passing values
25 for the RIM and TRC Tests? If so, what were the results

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

of those sensitivities?

A. Yes. Tampa Electric performed a series of sensitivities that included the following: 1) decrease the incentive to the point where the Participant Test still passes and then determine the RIM Test values; 2) decrease the incentive to the point where the RIM Test finally achieves a passing value and then examine the resulting Participant Test values; and 3) decrease the technology cost to the point where the TRC Test finally passes and then examine the resulting Participant Test values.

The results of the first sensitivity (Participant Test/RIM Test) indicate the incentive levels for pilot residential and commercial programs can be decreased to \$6,779 and \$14,358, respectively, and still maintain Participant Test viability. However, the resulting RIM Test values only reach a level of 0.50 and 0.46, respectively. These reduced incentive levels are as low as the Participant Test can withstand and still maintain cost-effectiveness for the customer; however, the respective RIM values do not pass and therefore cannot support an ongoing program that will be equitable to the general body of ratepayers.

1 The results of the second sensitivity (RIM
2 Test/Participant Test) indicate there is no level of
3 incentive that the RIM Test can support and sustain cost-
4 effectiveness. In other words, even at a zero incentive
5 level for both pilot residential and commercial programs,
6 both programs continue to fail the RIM Test with RIM
7 values of 0.73 and 0.77, respectively.

8
9 The results of the third sensitivity (TRC
10 Test/Participant Test) indicate that technology costs
11 must drop to \$1,205 per kW for residential systems and
12 \$1,201 per kW for commercial systems so that the TRC Test
13 gives a passing value of greater than 1.0. Given the
14 difference in magnitude between these costs per KW and
15 the 2013 average cost of \$3,419 per kW Tampa Electric
16 experienced, it seems unlikely a passing TRC Test value
17 will materialize.

18
19 In summary, for now and the foreseeable future these
20 sensitivity analyses do not support the potential of PV
21 to be promoted as a cost-effective DSM program for Tampa
22 Electric. Based on the pilot program results to date,
23 the technology does not pass the RIM Test under any
24 circumstance and the only way to pass the TRC Test is for
25 the technology cost to significantly decrease from its

1 most recent actual level of \$3,419 per kW to \$1,201 per
2 kW - a precipitous fall indeed.

3

4 **Q.** What do the cost-effectiveness test values for the pilot
5 residential SWH program mean?

6

7 **A.** The pilot residential SWH program cost-effectiveness
8 values are as depressed as the pilot PV programs.
9 Specifically, the RIM value is 0.56; the TRC value is
10 0.28; and the Participant Test value is 0.71. These
11 values have been calculated with the \$1,000 incentive
12 included.

13

14 From a RIM Test perspective, this means the total
15 benefits associated with this program are far too small
16 compared to the company costs necessary to deliver the
17 program. From a TRC Test perspective, the total benefits
18 are also far too small compared to the overall program
19 costs associated with delivering this program. Finally,
20 from a Participant Test perspective, even with the \$1,000
21 incentive, the participant is not made whole since the
22 savings on the electric bill will not recoup the net
23 equipment cost. Therefore, the customer should not
24 install the SWH technology because it is not cost-
25 effective to do so.

1 **Q.** As with the PV programs, did Tampa Electric perform
2 sensitivities on the various tests to determine what
3 combination of incentives and technology costs, if any,
4 could result in passing values? If so, what were the
5 results of those sensitivities?
6

7 **A.** Yes, Tampa Electric performed sensitivity analyses on the
8 pilot residential SWH program. The first analysis was to
9 determine if the RIM Test could reach a passing value.
10 Even with an incentive of zero dollars, the RIM Test only
11 achieved a value of 0.80.
12

13 The second analysis was to determine how large an
14 incentive was necessary for the Participant Test to reach
15 a passing value. A passing value was achieved at an
16 incentive of \$3,740; however, the RIM Test plummeted to a
17 value of 0.31 due to the increased magnitude of the
18 incentive.
19

20 The third analysis was to determine what decrease in
21 equipment cost would be necessary in order to reach a
22 passing value for the TRC Test. The analysis
23 demonstrated that an equipment cost of \$1,051 would allow
24 the TRC Test to achieve a passing value. However, when
25 that cost is compared to the pilot program's 2013 average

1 installed equipment cost of \$5,656 per SWH system, it
2 seems highly unlikely that level of reduction in the
3 equipment cost will ever occur.

4
5 In summary, there appears to be no opportunity for SWH to
6 be developed into a cost-effective DSM program in the
7 foreseeable future.

8
9 **Q.** Based on these cost-effectiveness evaluations and
10 subsequent sensitivities conducted by Tampa Electric,
11 does the company anticipate continuing to offer
12 incentives for the solar technologies contained in the
13 pilot programs at the end of the required pilot program
14 period?

15
16 **A.** No. The pilot solar technologies initiative ordered by
17 the Commission was established to determine DSM program
18 viability. Tampa Electric believes viability has been
19 determined, and in fact, does not exist. Therefore, any
20 continuation of expenditures on this renewable initiative
21 exacerbates two existing conditions: 1) the continued
22 upward pressure on the ECCR Clause for programs that do
23 not pass RIM or TRC cost-effectiveness tests, and 2) the
24 continued payment of subsidies from non-participants to
25 those customers installing the technologies. These

1 subsidizing payments made through the collection of pilot
2 program costs in the ECCR Clause are being levied against
3 the non-participating general body of ratepayers who are
4 not receiving their commensurate level of benefits. It
5 is simply not a responsible use of ratepayer dollars to
6 promote these programs under any cost-effectiveness test.

7
8 **CONCLUSIONS**

9
10 **Q.** What overall DSM goals are reasonably achievable for
11 Tampa Electric for the 2015-2024 period?

12
13 **A.** Based on the analysis performed by Tampa Electric for
14 this current DSM goals setting process, the company's
15 reasonably achievable generator level RIM-based DSM goals
16 for the 2015-2024 period are 56.3 MW of summer demand
17 savings, 78.3 MW of winter demand savings, and 144.3 GWH
18 of annual energy savings. These amounts are detailed on
19 an annual basis for both the residential and
20 commercial/industrial sectors in Document No. 1 of my
21 exhibit.

22
23 By accomplishing these DSM goals, Tampa Electric will
24 increase overall energy efficiency in its service area
25 and lower electric rates for all customers. The company

1 is quite aware that keeping electric rates as low as
2 possible while advancing broad scale efforts of overall
3 conservation is important to its customers and therefore
4 the company.

5
6 **Q.** Does the methodology used by Tampa Electric to set DSM
7 goals for the 2015-2024 period comport with statutory and
8 F.A.C. requirements?

9
10 **A.** Yes. Tampa Electric began its evaluation process with a
11 comprehensive list of potential DSM measures for
12 residential and commercial and industrial sectors,
13 applied those measures over multiple construction and
14 building types, and considered several aspects of measure
15 interaction as well as free ridership. Tampa Electric
16 adhered to statutory requirements by developing estimated
17 technical and achievable potentials while properly
18 reflecting cost and benefits to all customers.
19 Additionally, Tampa Electric utilized a sound, proven
20 approach that has been used and approved in principle by
21 this Commission in past DSM goals setting proceedings.

22
23 **Q.** Do Tampa Electric's proposed DSM goals provide a cost-
24 effective means for all ratepayers to help meet the need
25 for additional generation through 2024?

1 **A.** Yes. Through the use of the RIM test, Tampa Electric has
2 assured its ratepayers that the most cost-effective
3 resources will be used to meet future capacity needs.
4

5 **Q.** Should Tampa Electric's proposed 2015-2024 DSM goals be
6 approved?
7

8 **A.** Yes. Tampa Electric's proposed 2015-2024 DSM goals meet
9 rule and statutory requirements, are cost-effective for
10 participants and non-participants, help to minimize the
11 rate impact for future capacity needs, address the
12 desires and needs of its customers, and are reasonably
13 achievable.
14

15 **Q.** Does this conclude your testimony?
16

17 **A.** Yes.
18
19
20
21
22
23
24
25

EXHIBIT

OF

HOWARD T. BRYANT

Table of Contents

DOCUMENT NO.	TITLE	PAGE
1	Tampa Electric's 2015-2024 Proposed DSM Goals	60
2	Comprehensive DSM Measure List	61
3	Technical Potential Study Update Process	69
4	Avoided Unit Cost Data	74
5	2015-2024 Achievable Potential for RIM and TRC	75
6	DSM Economic Potential Cost-Effectiveness Sensitivity Analyses	76
7	2015-2024 Bill Impacts of RIM and TRC Portfolios	77

Tampa Electric Company

2015 - 2024
Proposed Residential DSM Goals
(At the Generator)

Year	Summer Demand (MW)		Winter Demand (MW)		Annual Energy (GWH)	
	Incremental	Cuumulative	Incremental	Cuumulative	Incremental	Cuumulative
2015	1.1	1.1	2.6	2.6	1.8	1.8
2016	1.6	2.7	4.1	6.7	3.5	5.3
2017	2.2	4.9	5.2	11.9	4.8	10.1
2018	2.7	7.6	6.5	18.4	6.1	16.2
2019	3.1	10.7	7.6	26.0	6.9	23.1
2020	3.3	14.0	7.6	33.6	7.4	30.5
2021	3.3	17.3	8.0	41.6	7.7	38.2
2022	3.0	20.3	7.4	49.0	6.9	45.1
2023	2.9	23.2	6.8	55.8	6.3	51.4
2024	2.5	25.7	6.1	61.9	5.5	56.9

2015 - 2024
Proposed Commercial/Industrial DSM Goals
(At the Generator)

Year	Summer Demand (MW)		Winter Demand (MW)		Annual Energy (GWH)	
	Incremental	Cuumulative	Incremental	Cuumulative	Incremental	Cuumulative
2015	1.7	1.7	1.2	1.2	3.9	3.9
2016	2.5	4.2	1.3	2.5	6.0	9.9
2017	2.7	6.9	1.6	4.1	8.0	17.9
2018	3.3	10.2	1.7	5.8	9.2	27.1
2019	3.3	13.5	1.6	7.4	9.9	37.0
2020	3.5	17.0	1.7	9.1	10.3	47.3
2021	3.6	20.6	1.9	11.0	10.4	57.7
2022	3.3	23.9	1.9	12.9	10.2	67.9
2023	3.5	27.4	1.8	14.7	9.9	77.8
2024	3.2	30.6	1.7	16.4	9.6	87.4

Comprehensive Technical Potential Measure List

Residential

- 1 14 SEER Split-System Heat Pump
- 2 15 SEER Split-System Air Conditioner
- 3 15 SEER Split-System Heat Pump
- 4 17 SEER Split-System Air Conditioner
- 5 17 SEER Split-System Heat Pump
- 6 19 SEER Split-System Air Conditioner
- 7 AC Heat Recovery Units
- 8 AC Maintenance (Indoor Coil Cleaning)
- 9 AC Maintenance (Outdoor Coil Cleaning)
- 10 Ceiling R-0 to R-19 Insulation
- 11 Ceiling R-19 to R-38 Insulation
- 12 CFL (18-Watt integral ballast), 0.5 hr/day
- 13 CFL (18-Watt integral ballast), 2.5 hr/day
- 14 CFL (18-Watt integral ballast), 6.0 hr/day
- 15 Default Window With Sunscreen
- 16 Duct Repair
- 17 Electronically Commutated Motors (ECM) on an Air Handler Unit
- 18 Energy Star CW CEE Tier 2 (MEF=2.0)
- 19 Energy Star CW CEE Tier 3 (MEF=2.2)
- 20 Energy Star Desktop PC
- 21 Energy Star DVD Player
- 22 Energy Star DW (EF=0.68)
- 23 Energy Star Laptop PC
- 24 Energy Star Set-Top Box
- 25 Energy Star TV
- 26 Energy Star VCR
- 27 Faucet Aerators
- 28 HE Freezer
- 29 HE Refrigerator - Energy Star version of above
- 30 HE Room Air Conditioner - EER 11
- 31 HE Room Air Conditioner - EER 12
- 32 Heat Pump Water Heater (EF=2.9)
- 33 Heat Trap
- 34 High Efficiency One Speed Pool Pump (1.5 hp)
- 35 Low Flow Showerhead
- 36 Pipe Wrap
- 37 Proper Refrigerant Charging and Air Flow
- 38 PV-Powered Pool Pumps
- 39 Radient Barrier
- 40 Reflective Roof
- 41 RET 2L4'T8, 1EB
- 42 ROB 2L4'T8, 1EB
- 43 Sealed Attic w/Sprayed Foam Insulated Roof Deck

- 44 Sealed Attics
- 45 Single Pane Clear Windows to Double Pane Low-E Windows
- 46 Solar Water Heating
- 47 Two Speed Pool Pump (1.5 hp)
- 48 Variable-Speed Pool Pump (<1 hp)
- 49 Wall 2x4 R-0 to Blow-In R-13 Insulation
- 50 Water Heater Blanket
- 51 Water Heater Temperature Check and Adjustment
- 52 Water Heater Timeclock
- 53 Weather Strip/Caulk w/Blower Door
- 54 Window Film
- 55 Window Tinting
- 56 Photovoltaic System

New Measures

- 1 LED (12-Watt integral ballast), 0.5 hr/day
- 2 LED (12-Watt integral ballast), 2.5 hr/day
- 3 LED (12-Watt integral ballast), 6.0 hr/day
- 4 LED 13W Flood Outdoor
- 5 Refrigerator recycling
- 6 Freezer recycling
- 7 Smart Plug

Eliminated Measures

- 1 14 SEER Split-System Air Conditioner
- 2 HVAC Proper Sizing
- 3 14 SEER Split-System Heat Pump
- 4 High Efficiency CD (EF=3.01 w/moisture sensor)
- 5 High Efficiency Water Heating (EF=0.93)

58 Total Measures Evaluated

Commercial

- 1 Aerosole Duct Sealing
- 2 Air Handler Optimization
- 3 Anti-sweat (humidistat) controls
- 4 Ceiling Insulation
- 5 Centrifugal Chiller, 0.51 kW/ton, 500 tons
- 6 CFL Hardwired, Modular 18W
- 7 CFL Screw-in 18W
- 8 Chiller Tune Up/Diagnostics
- 9 Compressor VSD retrofit
- 10 Continuous Dimming
- 11 Convection Oven
- 12 Cool Roof

- 13 Copier Power Management Enabling
- 14 Demand Control Ventilation (DCV)
- 15 Demand controlled circulating systems
- 16 Demand Defrost Electric
- 17 Demand Hot Gas Defrost
- 18 Duct/Pipe Insulation
- 19 DX Coil Cleaning
- 20 DX Packaged System, EER=11.9, 10 tons
- 21 DX Tune Up/ Advanced Diagnostics
- 22 Efficient compressor motor
- 23 Efficient Fryer
- 24 Electronically Commutated Motors (ECM) on an Air Handler Unit
- 25 EMS - Chiller
- 26 EMS Optimization
- 27 Energy Recovery Ventilation (ERV)
- 28 Energy Star or Better Copier
- 29 Energy Star or Better Monitor
- 30 Evaporator fan controller for MT walk-ins
- 31 Floating head pressure controls
- 32 Freezer-Cooler Replacement Gaskets
- 33 Geothermal Heat Pump, EER=13, 10 tons
- 34 HE PTAC, EER=9.6, 1 ton
- 35 Heat Pump Water Heater (air source)
- 36 Heat Recovery Unit
- 37 Heat Trap
- 38 High Bay T5
- 39 High Efficiency Chiller Motors
- 40 High Efficiency Fan Motor, 15hp, 1800rpm, 92.4%
- 41 High Pressure Sodium 250W Lamp
- 42 High R-Value Glass Doors
- 43 High-efficiency fan motors
- 44 Hot Water Pipe Insulation
- 45 Hybrid Dessicant-DX System (Trane CDQ)
- 46 LED Display Lighting
- 47 LED Exit Sign
- 48 Lighting Control Tuneup
- 49 Monitor Power Management Enabling
- 50 Multiplex Compressor System
- 51 Night covers for display cases
- 52 Occupancy Sensor
- 53 Occupancy Sensor (hotels)
- 54 Optimize Controls
- 55 Outdoor Lighting Controls (Photocell/Timeclock)
- 56 Oversized Air Cooled Condenser
- 57 Packaged HP System, EER=11.7, 10 tons
- 58 PC Manual Power Management Enabling
- 59 PC Network Power Management Enabling

- 60 Premium T8, EB, Reflector
- 61 Premium T8, Electronic Ballast
- 62 Printer Power Management Enabling
- 63 PSMH, 250W, magnetic ballast
- 64 Refrigeration Commissioning
- 65 ROB Premium T8, 1EB
- 66 ROB Premium T8, EB, Reflector
- 67 Roof Insulation
- 68 Separate Makeup Air / Exhaust Hoods AC
- 69 Solar Water Heater
- 70 Strip curtains for walk-ins
- 71 Thermal Energy Storage (TES)
- 72 Variable Speed Drive Control
- 73 Vending Misers (cooled machines only)
- 74 VSD for Chiller Pumps and Towers
- 75 Window Film (Standard)
- 76 Photovoltaic System

New Measures

- 1 LED Linear Tube 22W
- 2 Flood LED 14W
- 3 LED (12-Watt)
- 4 Outdoor LED 104W
- 5 LED High Bay 83W (400W equivalent)
- 6 Run Time Optimizer
- 7 dehumidification hybrid desiccant heat pump
- 8 Ice Machine
- 9 0.5 Faucet Aerator (DI) - Commercial
- 10 1.0 gpm Faucet Aerator (DI) -Commercial
- 11 1.5 gpm Showerhead (DI) - Commercial
- 12 Server Virtualization
- 13 Griddle
- 14 Steamer
- 15 Holding Cabinet

Eliminated Measures

- 1 High Efficiency Water Heater (electric)

90 Total Measures Evaluated

Industrial

- 1 Aerosole Duct Sealing
- 2 Air conveying systems
- 3 Bakery - Process
- 4 Bakery - Process (Mixing) - O&M

- 5 Centrifugal Chiller, 0.51 kW/ton, 500 tons
- 6 CFL Hardwired, Modular 18W
- 7 CFL Screw-in 18W
- 8 Chiller Tune Up/Diagnostics
- 9 Clean Room - Controls
- 10 Clean Room - New Designs
- 11 Comp Air - ASD (100+ hp)
- 12 Comp Air - ASD (1-5 hp)
- 13 Comp Air - ASD (6-100 hp)
- 14 Comp Air - Motor practices-1 (100+ HP)
- 15 Comp Air - Motor practices-1 (1-5 HP)
- 16 Comp Air - Motor practices-1 (6-100 HP)
- 17 Comp Air - Replace 100+ HP motor
- 18 Comp Air - Replace 1-5 HP motor
- 19 Comp Air - Replace 6-100 HP motor
- 20 Compressed Air - Controls
- 21 Compressed Air - System Optimization
- 22 Compressed Air- Sizing
- 23 Compressed Air-O&M
- 24 Cool Roof
- 25 Direct drive Extruders
- 26 Drives - EE motor
- 27 Drives - Optimization process (M&T)
- 28 Drives - Process Control
- 29 Drives - Process Controls (batch + site)
- 30 Drives - Scheduling
- 31 Drying (UV/IR)
- 32 Duct/Pipe Insulation
- 33 DX Coil Cleaning
- 34 DX Packaged System, EER=11.9, 10 tons
- 35 DX Tune Up/ Advanced Diagnostics
- 36 Efficient Curing ovens
- 37 Efficient desalter
- 38 Efficient drives
- 39 Efficient drives - rolling
- 40 Efficient electric melting
- 41 Efficient grinding
- 42 Efficient Machinery
- 43 Efficient practices printing press
- 44 Efficient Printing press (fewer cylinders)
- 45 Efficient processes (welding, etc.)
- 46 Efficient Refrigeration - Operations
- 47 EMS - Chiller
- 48 EMS Optimization - Chiller
- 49 Extruders/injection Moulding-multipump
- 50 Fans - ASD (100+ hp)
- 51 Fans - ASD (1-5 hp)

- 52 Fans - ASD (6-100 hp)
- 53 Fans - Controls
- 54 Fans - Motor practices-1 (100+ HP)
- 55 Fans - Motor practices-1 (1-5 HP)
- 56 Fans - Motor practices-1 (6-100 HP)
- 57 Fans - O&M
- 58 Fans - Replace 100+ HP motor
- 59 Fans - Replace 1-5 HP motor
- 60 Fans - Replace 6-100 HP motor
- 61 Fans - System Optimization
- 62 Fans- Improve components
- 63 Gap Forming papermachine
- 64 Geothermal Heat Pump, EER=13, 10 tons
- 65 Heat Pumps - Drying
- 66 Heating - Optimization process (M&T)
- 67 Heating - Process Control
- 68 Heating - Scheduling
- 69 High Bay T5
- 70 High Consistency forming
- 71 High Efficiency Chiller Motors
- 72 Hybrid Dessicant-DX System (Trane CDQ)
- 73 Injection Moulding - Direct drive
- 74 Injection Moulding - Impulse Cooling
- 75 Intelligent extruder (DOE)
- 76 Light cylinders
- 77 Machinery
- 78 Membranes for wastewater
- 79 Near Net Shape Casting
- 80 New transformers welding
- 81 O&M - Extruders/Injection Moulding
- 82 O&M/drives spinning machines
- 83 Occupancy Sensor
- 84 Optimization control PM
- 85 Optimization Refrigeration
- 86 Optimize Controls
- 87 Optimize drying process
- 88 Other Process Controls (batch + site)
- 89 Power recovery
- 90 Premium T8, Electronic Ballast
- 91 Process control
- 92 Process Drives - ASD
- 93 Process optimization
- 94 Pumps - ASD (100+ hp)
- 95 Pumps - ASD (1-5 hp)
- 96 Pumps - ASD (6-100 hp)
- 97 Pumps - Controls
- 98 Pumps - Motor practices-1 (100+ HP)

- 99 Pumps - Motor practices-1 (1-5 HP)
- 100 Pumps - Motor practices-1 (6-100 HP)
- 101 Pumps - O&M
- 102 Pumps - Replace 100+ HP motor
- 103 Pumps - Replace 1-5 HP motor
- 104 Pumps - Replace 6-100 HP motor
- 105 Pumps - Sizing
- 106 Pumps - System Optimization
- 107 Refinery Controls
- 108 Replace V-Belts
- 109 Roof Insulation
- 110 Top-heating (glass)
- 111 VSD for Chiller Pumps and Towers
- 112 Window Film (Standard) - Chiller

New Measure

- 1 Run Time Optimizer
- 2 Dehumidification Hybrid Desiccant Heat Pump (5 TON)
- 3 LED Linear Tube 22W
- 4 Flood LED 14W
- 5 LED High Bay 83W

Eliminated Measures

None

117 Total Measures Evaluated

Demand Response

Residential

- 1 In home display with peak threshold warning system and pre set control strategies
- 2 On-off switching via low-power wireless communication technology
- 3 Smart thrermostats
- 4 Switch - cycling program
- 5 Switch - shedding program

Commercial

- 1 Automated control strategies
- 2 Direct load control

Industrial

- 1 Automated control strategies
- 2 Direct load control

Total Measures

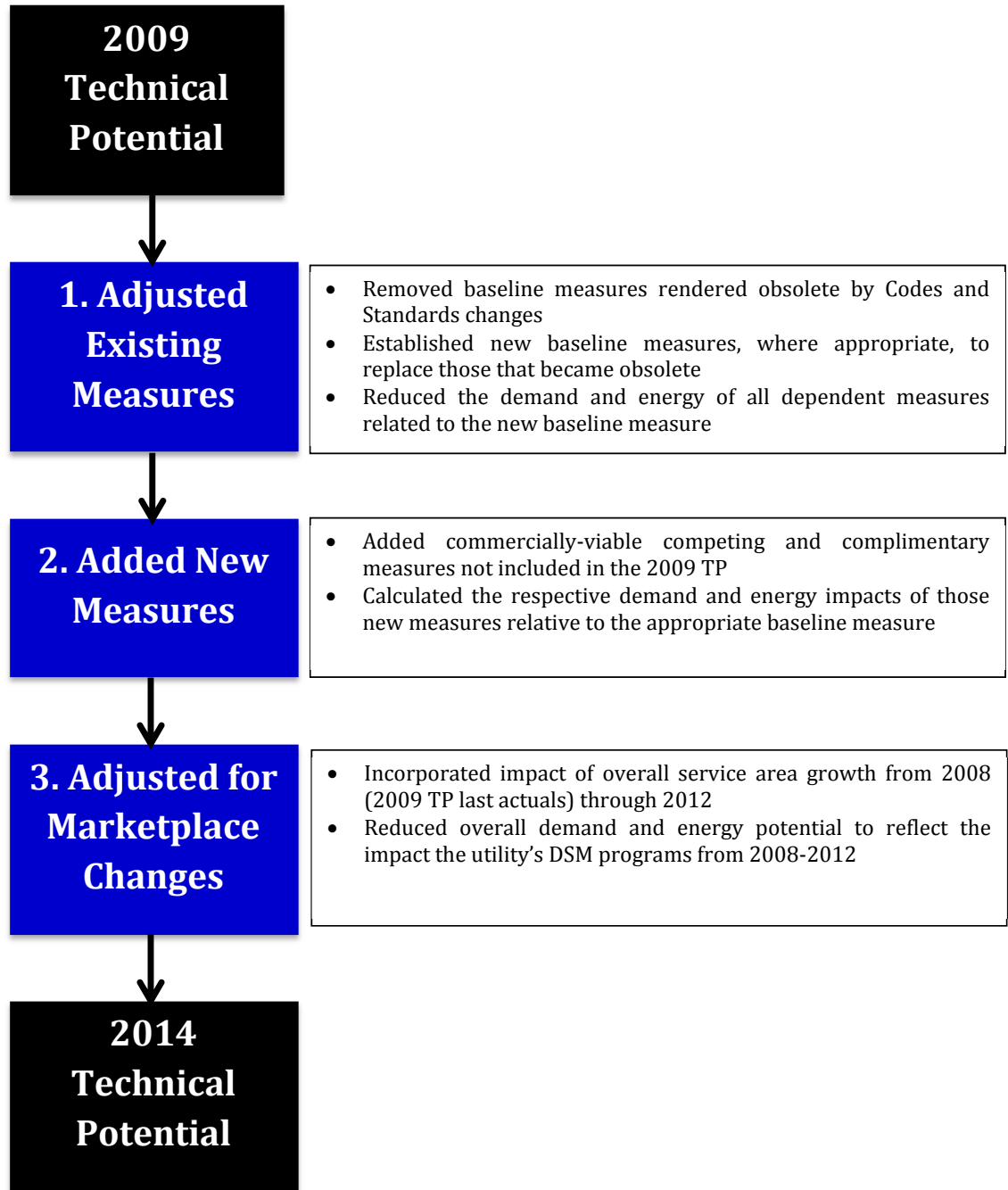
265 Energy Efficiency

9 Demand Response

274 Total

Tampa Electric 2014 Technical Potential Update Methodology

Updating the energy efficiency measures included all steps. Step 3 was performed for demand response and photovoltaic measures as there were no applicable Codes and Standards changes or new measures.



Tampa Electric 2014 Technical Potential Update Methodology

Definitions

- **Technical potential (“TP”)** - An analysis performed in the DSM Goals development process to identify the theoretical limit of electric peak demand (MW) and energy (GWh) reductions. The TP assumes every measure is installed everywhere it could be physically installed, regardless of cost, customer acceptance or any other real-world constraints. The 2014 TP is the 2009 TP updated to reflect subsequent technology and marketplace changes.
- **Codes and Standards** - Florida Building Codes and Federal equipment manufacturing standards.
- **Baseline measure** - A measure which represents the minimum demand and energy impacts for a technology (e.g., 14 SEER for air-conditioning as prescribed by 2015 Codes and Standards). The baseline measure serves as the basis for calculating the incremental impacts for related dependent measures.
- **Dependent measure** - A measure related to a baseline measure with demand and energy impact values that are incremental to its baseline measure (e.g., a 15 SEER air-conditioner vs. the 14 SEER baseline measure).
- **Competing measure** - A dependent measure which “competes” or displaces another similar measure from being implemented (e.g., high efficiency air-conditioners with SEER values of 15 or 17 could not both be installed to serve the same cooling load).
- **Complimentary measure** - A dependent measure that can add incremental demand and energy impacts independent of other measures (e.g., ceiling insulation). The size of these measures’ incremental impacts can be affected by other measures (e.g., impact of ceiling insulation can be affected by the level of air-conditioning efficiency).

Tampa Electric 2014 Technical Potential Update Methodology

I. Energy Efficiency Existing Measures' Adjustments

A. Removed obsolete baseline measures

1. Identified 2009 baseline measures impacted by new codes and standards
2. Identified new baseline measures replacing the obsolete ones
3. Determined each new baseline measure's savings impact values
4. Zeroed out each new baseline measure's savings impact values (since those measures do not contribute to incremental savings)

B. Reduced associated dependent measures' impacts

1. Calculated the incremental difference in the savings impacts between the associated dependent measures and the new baseline measures
2. Calculated the incremental difference between associated dependent measures and their 2009 technical potential baseline measure
3. Calculated the adjustment factor for each by dividing the values from step 1 by the values from step 2
4. Multiplied the affected dependent measures' 2009 technical potential total savings impacts by their adjustment factors

II. Energy Efficiency Adjustments for New Measures

A. Competing Measures

1. Identified the appropriate baseline measures
2. Identified existing dependent measures associated with these baseline measures
3. Calculated the available incremental savings impacts remaining for the new measure (baseline measure impact less the sum of the impacts from the existing dependent measures)
4. Calculated the incremental percentage of savings impacts for each new competing measure from the associated baseline measure
5. Multiplied the values from step 3 by the values from step 4

B. Complimentary Measures

1. Steps 1, 2 and 3 for competing measures duplicated for complimentary measures
2. Calculated the maximum percentage of savings impacts for each new complimentary measure from the associated baseline measure
3. Step 5 for competing measures duplicated for complimentary measures

III. Energy Efficiency Market Size Adjustments

A. Overall Market Growth

1. Calculated five-year overall customer growth percentage from year end 2007 (actuals through 2007 used as basis for 2009 technical potential) through 2012 based on values reported in the company's 2013 Ten-Year Site Plan
2. Multiplied the total overall savings impacts by the value from step 1
3. Added the values from step 2 to the total overall savings impacts

B. DSM Program Achievements

1. Calculated the 2008-2012 DSM program savings achievements as reported in the company's annual FEECA achievement reports
2. Subtracted the values from step 1 from the total savings impacts

IV. Demand Response

- A. Calculated the 2008-2012 DSM program savings achievements as reported in the company's annual FEECA achievement reports
- B. Subtracted the values from step 1 from the 2009 technical potential total overall savings impacts for demand response

V. Photovoltaics

- A. Calculated five-year savings values for 2008-2012 as reported in the company's net metering reports which was inclusive of solar pilot programs
- B. Subtracted the values from step 1 from the 2009 technical potential total overall savings impacts for photovoltaics

Tampa Electric Technical Potential Update Results

Energy Efficiency

	System Total			Residential			Commercial/Industrial		
	GWH	Sum. MW	Win. MW	GWH	Sum. MW	Win. MW	GWH	Sum. MW	Win. MW
ITRON Original Technical Potential	5,853	1,412	903	3,102	857	598	2,751	555	305
Adjusted for Standard/Code Changes	4,890	1,188	771	2,524	711	505	2,367	477	267
New Measures Added	5,987	1,325	852	3,038	757	554	2,949	568	298
Adjusted for Customer Growth	6,148	1,360	875	3,120	777	569	3,028	583	306
Adjusted for DSM Accomplishments	5,961	1,306	823	3,038	744	529	2,923	562	294
2014 Technical Potential	5,961	1,306	823	3,038	744	529	2,923	562	294

Demand Response

	System Total		Residential		Commercial/Industrial	
	Sum. MW	Win. MW	Sum. MW	Win. MW	Sum. MW	Win. MW
ITRON Original Technical Potential	550	485	342	399	208	86
Adjusted for Customer Growth	564	498	351	410	213	88
Adjusted for DSM Accomplishments	502	430	346	404	156	26
2014 Technical Potential	502	430	346	404	156	26

Renewable

	System Total			Residential			Commercial		
	GWH	Sum. MW	Win. MW	GWH	Sum. MW	Win. MW	GWH	Sum. MW	Win. MW
ITRON Original Technical Potential	7,693	2,855	436	3,673	1,333	243	4,020	1,522	193
Adjusted for Customer Growth	7,899	2,932	448	3,771	1,369	250	4,128	1,563	198
Adjusted for DSM Accomplishments	7,892	2,929	447	3,769	1,368	249	4,123	1,561	198
2014 Technical Potential	7,892	2,929	447	3,769	1,368	249	4,123	1,561	198

TAMPA ELECTRIC COMPANY
AVOIDED UNIT COST DATA
2015 DSM Goals Setting

1. In-service Date:	May 1, 2019
2. Type of Unit:	7 FA.05 CT
3. Type of Fuel:	Natural Gas
4. Average Annual heat rate: Average (Btu/kWh)	10,046
5. Cost of Fuel: Natural Gas (2019 \$/MMBtu)	5.59
6. Construction Cost (W/O AFUDC)	
a: 2013 \$000	125,724
b: \$/kW (based on average rating)	613.29
7. Construction Escalation Rate 2013 & beyond	3.0%
8. In-service Cost (W/AFUDC)	
a: 2019 \$000	158,677
b: \$/kW (based on average rating)	774.04
9. Incremental Capital Structure	
a: Debt	46.00%
c: Common Stock	54.00%
10. Cost of Capital	
a: Debt	6.40%
c: Common Stock	10.25%
11. Book Life	25
12. Tax Life	15
13. AFUDC Rate	6.45%
14. Effective Tax Rate	38.575%
15. Other Taxes (2019)	1.27%
16. Other Taxes Escalation Rate	0.00%
17. Discount Rate for Present Worth	7.34%
18. Fixed O&M Costs (2013 \$/kW/yr)	11.40
19. Variable O&M Costs (2013 \$/MWh)	1.80
20. O&M Escalation Rate 2013 & beyond	2.4%
21. Value of K-factor	1.4625
22. Capacity (kW) Winter	220,000
23. Capacity (kW) Summer	190,000

Tampa Electric Company

2015 - 2024
Residential Achievable Potential
RIM Evaluation
(At the Generator)

Year	Summer Demand (MW)		Winter Demand (MW)		Annual Energy (GWH)	
	Incremental	Cuumulative	Incremental	Cuumulative	Incremental	Cuumulative
2015	1.1	1.1	2.6	2.6	1.8	1.8
2016	1.6	2.7	4.1	6.7	3.5	5.3
2017	2.2	4.9	5.2	11.9	4.8	10.1
2018	2.7	7.6	6.5	18.4	6.1	16.2
2019	3.1	10.7	7.6	26.0	6.9	23.1
2020	3.3	14.0	7.6	33.6	7.4	30.5
2021	3.3	17.3	8.0	41.6	7.7	38.2
2022	3.0	20.3	7.4	49.0	6.9	45.1
2023	2.9	23.2	6.8	55.8	6.3	51.4
2024	2.5	25.7	6.1	61.9	5.5	56.9

Tampa Electric Company

2015 - 2024
Residential Achievable Potential
TRC Evaluation
(At the Generator)

Year	Summer Demand (MW)		Winter Demand (MW)		Annual Energy (GWH)	
	Incremental	Cuumulative	Incremental	Cuumulative	Incremental	Cuumulative
2015	1.5	1.5	3.4	3.4	3.3	3.3
2016	2.5	4.0	5.9	9.3	6.3	9.6
2017	3.5	7.5	8.0	17.3	8.8	18.4
2018	4.3	11.8	9.6	26.9	10.9	29.3
2019	4.8	16.6	10.3	37.2	12.3	41.6
2020	4.8	21.4	9.7	46.9	12.5	54.1
2021	4.3	25.7	7.9	54.8	11.4	65.5
2022	3.8	29.5	6.3	61.1	10.0	75.5
2023	3.5	33.0	5.3	66.4	9.3	84.8
2024	3.2	36.2	4.6	71.0	8.6	93.4

2015 - 2024
Commercial/Industrial Achievable Potential
RIM Evaluation
(At the Generator)

Year	Summer Demand (MW)		Winter Demand (MW)		Annual Energy (GWH)	
	Incremental	Cuumulative	Incremental	Cuumulative	Incremental	Cuumulative
2015	1.7	1.7	1.2	1.2	3.9	3.9
2016	2.5	4.2	1.3	2.5	6.0	9.9
2017	2.7	6.9	1.6	4.1	8.0	17.9
2018	3.3	10.2	1.7	5.8	9.2	27.1
2019	3.3	13.5	1.6	7.4	9.9	37.0
2020	3.5	17.0	1.7	9.1	10.3	47.3
2021	3.6	20.6	1.9	11.0	10.4	57.7
2022	3.3	23.9	1.9	12.9	10.2	67.9
2023	3.5	27.4	1.8	14.7	9.9	77.8
2024	3.2	30.6	1.7	16.4	9.6	87.4

2015 - 2024
Commercial/Industrial Achievable Potential
TRC Evaluation
(At the Generator)

Year	Summer Demand (MW)		Winter Demand (MW)		Annual Energy (GWH)	
	Incremental	Cuumulative	Incremental	Cuumulative	Incremental	Cuumulative
2015	2.4	2.4	1.6	1.6	6.5	6.5
2016	3.5	5.9	2.0	3.6	10.6	17.1
2017	4.1	10.0	2.6	6.2	15.3	32.4
2018	4.9	14.9	2.4	8.6	16.1	48.5
2019	5.2	20.1	2.7	11.3	19.4	67.9
2020	5.8	25.9	3.2	14.5	20.8	88.7
2021	6.0	31.9	2.9	17.4	21.5	110.2
2022	6.0	37.9	2.9	20.3	21.8	132.0
2023	6.1	44.0	3.1	23.4	22.0	154.0
2024	6.0	50.0	3.1	26.5	21.6	175.6

TAMPA ELECTRIC COMPANY
DOCKET NO. 130201-EI
EXHIBIT NO. _____ (HTB-1)
WITNESS: BRYANT
DOCUMENT NO. 5
PAGE 1 OF 1
FILED: 04/02/2014

FUEL SENSITIVITIES

RIM

Sensitivity Scenarios	Total Individual Measures	Percent to Base	Annual Energy		Summer Demand		Winter Demand	
			GWH	Percent to Base	MW	Percent to Base	MW	Percent to Base
Base	556	100.0%	1,758.1	100.0%	545.2	100.0%	474.5	100.0%
Low Fuel	495	89.0%	1,544.8	87.9%	454.1	83.3%	413.8	87.2%
High Fuel	590	106.1%	1,943.4	110.5%	597.9	109.7%	495.9	104.5%

TRC

Sensitivity Scenarios	Total Individual Measures	Percent to Base	Annual Energy		Summer Demand		Winter Demand	
			GWH	Percent to Base	MW	Percent to Base	MW	Percent to Base
Base	878	100.0%	2,247.6	100.0%	578.7	100.0%	438.1	100.0%
Low Fuel	817	93.1%	1,918.7	85.4%	424.9	73.4%	350.2	79.9%
High Fuel	949	108.1%	2,390.2	106.3%	633.2	109.4%	475.7	108.6%

77

2015-2024
Bill Impacts of RIM and TRC Portfolios

Year	DSM Portfolio Costs			Annual Bill Impact (1,200 KWH)		
	RIM	TRC	Delta	RIM	TRC	Delta
2015	\$47,489,234	\$52,354,256	\$4,865,022	\$1,655.30	\$1,659.62	\$4.32
2016	\$47,288,857	\$52,252,677	\$4,963,820	\$1,644.81	\$1,649.18	\$4.36
2017	\$47,125,211	\$52,190,792	\$5,065,581	\$1,630.40	\$1,634.80	\$4.40
2018	\$46,995,979	\$52,166,373	\$5,170,395	\$1,643.10	\$1,647.53	\$4.43
2019	\$46,899,046	\$52,177,399	\$5,278,353	\$1,648.88	\$1,653.35	\$4.47
2020	\$46,832,488	\$52,222,038	\$5,389,550	\$1,671.88	\$1,676.39	\$4.52
2021	\$46,794,553	\$52,298,636	\$5,504,083	\$1,689.60	\$1,694.16	\$4.56
2022	\$46,783,650	\$52,405,703	\$5,622,052	\$1,707.91	\$1,712.52	\$4.61
2023	\$46,798,338	\$52,541,898	\$5,743,560	\$1,753.28	\$1,757.93	\$4.66
2024	\$46,837,309	\$52,706,023	\$5,868,714	\$1,771.86	\$1,776.56	\$4.70
Total	\$469,844,664	\$523,315,794	\$53,471,130	\$16,817.02	\$16,862.04	\$45.02

TAMPA ELECTRIC COMPANY
DOCKET NO. 130201-EI
EXHIBIT NO. _____ (HTB-1)
WITNESS: BRYANT
DOCUMENT NO. 7
PAGE 1 OF 1
FILED: 04/02/2014