



July 12, 2019

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

RE: Docket No. 20190016-EG

Dear Mr. Teitzman:

Attached for electronic filing in the above-referenced docket is the prepared rebuttal testimony of John N. Floyd.

Sincerely,

A handwritten signature in blue ink that reads 'C. Shane Boyett'.

C. Shane Boyett
Regulatory, Forecasting and Pricing Manager

md

Attachments

cc: Florida Public Service Commission
Rachael Dziechciarz, Office of the General Counsel (5 copies)
Gulf Power Company
Russell Badders, Esq., VP & Associate General Counsel
Beggs and Lane

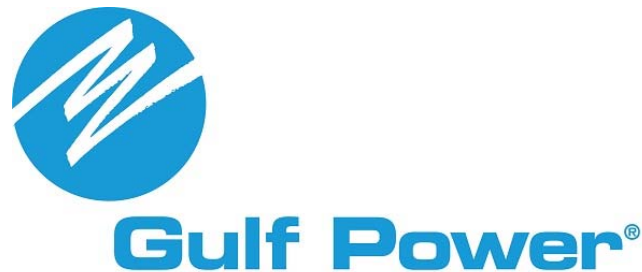
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**COMMISSION REVIEW OF NUMERIC
CONSERVATION GOALS**

Docket No. 20190016-EG

Rebuttal Testimony of
John N. Floyd

July 12, 2019



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

Gulf Power Company
Before the Florida Public Service Commission
Prepared Rebuttal Testimony of
John N. Floyd
Docket No. 20190016-EG
Commission Review of Numeric Conservation Goals
July 12, 2019

Q. Please state your name, business address, employer and position.

A. My name is John N. Floyd, and my business address is One Energy Place, Pensacola, Florida 32520. I am employed by Gulf Power Company (Gulf Power, Gulf or the Company) as the Manager of Strategy and Market Intelligence.

Q. Have you previously filed testimony in this proceeding?

A. Yes.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to respond to certain assertions and recommendations made by Southern Alliance for Clean Energy (SACE) Witnesses Grevatt and Bradley-Wright. First, I address Witness Grevatt's and Witness Bradley-Wright's overall proposals concerning the appropriate level and type of conservation goals to be established in this docket. Second, I respond to criticisms lodged by Witness Grevatt, and to a lesser extent, Witness Bradley-Wright, against use of the Rate Impact Measure (RIM) test and the Two-Year Payback Criterion to screen measures for ultimate inclusion in utility goals. Finally, I touch upon a

1 handful of other miscellaneous arguments put forth by these intervenor
2 witnesses.

3
4 **I. Intervenor Witness Goal Recommendations**

5
6 Q. What is your response to Witness Grevatt's recommendation that the
7 Commission establish conservation goals for Gulf Power of 1.5 percent of
8 annual sales?

9 A. Witness Grevatt's recommendation does not meet the requirements of
10 section 366.82, Florida Statutes and Rule 25-17.0021, Florida
11 Administrative Code, for developing goals. Specifically, section 366.82(3)
12 requires evaluation of the full technical potential of available energy
13 efficiency and demand-side renewable measures and consideration of
14 four criteria in establishing goals: (1) the costs and benefits to customers
15 participating in the measure; (2) the costs and benefits to the general body
16 of ratepayers as a whole, including utility incentives and participant
17 contributions; (3) the need for incentives to promote both customer-owned
18 and utility-owned energy efficiency and demand-side renewable energy
19 systems; and (4) the costs imposed by state and federal regulations on
20 the emission of greenhouse gases. Rule 25-17.0021(1), in turn, requires
21 that goals be "based on an estimate of the total cost-effective kilowatt and
22 kilowatt-hour savings reasonably achievable through demand-side
23 management in each utility's service area." This rule also requires
24 consideration of Florida-specific building codes, free-riders, and specific
25 market segments and end-use categories. Witness Grevatt's

1 recommended goals are not based on the criteria set forth in section
2 366.82(3) Florida Statutes, or the Commission's rules, but rather on an
3 arbitrary percentage of the Company's annual sales.

4

5 Furthermore, while Witness Grevatt does quantify specific numeric goals
6 for energy, he recommends that demand goals be set in a separate
7 proceeding, a process which, again, is not consistent with the
8 requirements of this proceeding. In essence, Witness Grevatt's
9 recommendations rest on the bare assumption that because two specific
10 utilities in other states have purportedly saved upwards of 1.5 percent of
11 electricity sales at least once, then a 1.5 percent goal must necessarily be
12 appropriate for Florida.

13

14 Q. Is it appropriate to rely on Demand-Side Management (DSM)
15 achievements in other states as a proxy for setting goals in Florida?

16 A. No. While the approach is simplistic in its appeal, it ignores many
17 significant factors that differ between states including climates, regulatory
18 frameworks, utility rates, building codes, utility planning processes, and
19 historical DSM achievements. Witness Deason, who is submitting rebuttal
20 testimony on behalf of Gulf Power and the other Florida Energy Efficiency
21 and Conservation Act (FEECA) Utilities, further explains why it is not
22 appropriate to base Florida's DSM goals on those in other states.

23

24

25

1 Q. How do Witness Grevatt's proposed goals compare to Gulf's current DSM
2 goals?

3 A. Witness Grevatt's proposed ten-year energy reduction goal of 1,297
4 gigawatt-hours (GWh) is over 1,200 GWh higher than Gulf's current ten-
5 year goal. The average goal he proposes for *each year* is almost double
6 Gulf's current ten-year goal. This proposal represents an increase of over
7 1,400 percent. Gulf's current goals were approved by the Commission as
8 reasonably achievable in accordance with the requirements of FEECA.
9 The stratospherically high goals proposed by the SACE witnesses are
10 clearly not achievable without record-setting spending by Gulf and
11 potentially not achievable at any cost. While Gulf has not performed a
12 detailed analysis of the cost to achieve such reductions, proration of actual
13 expenditures during Gulf's highest achievement years would suggest a
14 cost at least in the range of \$45 million per year, or more than at least four
15 times Gulf's current DSM spending.

16
17 Q. Are Witness Grevatt's recommendations based on Gulf Power's planning
18 process or cost-effectiveness analysis?

19 A. No. Witness Grevatt's goal recommendations are clearly not based on the
20 thorough planning process discussed in my direct testimony. His
21 recommendation is not based on Gulf's planning process at all, but
22 instead a simple percentage of sales calculation. Nor is his
23 recommendation based on cost effectiveness analyses as required by the
24 Florida Commission. His recommendation is more of a "pick a number"

25

1 method than anything rooted in the thoughtful, robust process followed in
2 Florida.

3

4 Q. At page 42 of his testimony, Witness Grevatt provides an estimate of Total
5 Resource Cost (TRC) test Achievable Potential based on “partial
6 corrections to the utilities’ analysis.” Can this calculation be relied upon in
7 setting goals in Florida?

8 A. Not at all. Witness Grevatt begins his “analysis” with a Gulf Economic
9 Potential value that represents a subset of Technical Potential. He then
10 attempts to translate Gulf’s Economic Potential values into Achievable
11 Potential values based on a simplistic assumption that 50 percent of this
12 Economic Potential is achievable based on studies in some other states.
13 Witness Grevatt does not offer any comparison of measures from those
14 studies as compared to Gulf’s study, the current adoption of measures
15 from those studies as compared to Gulf, the measures’ savings
16 characteristics used in those studies as compared to Gulf’s study,
17 incentive levels approaches, or any other analysis whatsoever. This
18 “analysis” simply cannot be utilized in calculating a credible Achievable
19 Potential estimate for Gulf Power. Tellingly, Witness Grevatt ultimately did
20 not make a recommendation for goals based on this approach, but instead
21 he opted for a simple percent of sales target.

22

23

24

25

1 Q. Is this the first time SACE or other parties have proposed DSM goals as a
2 flat percentage of sales for Gulf Power and other FEECA utilities?

3 A. No. In this same proceeding in 2014, SACE and Sierra Club witnesses
4 proposed a flat percentage goals of 1.0 percent based on DSM
5 achievements in a handful of other states. The Commission rejected
6 those proposals, finding “no competent or substantial evidence in the
7 record to support the goals proffered by either SACE or Sierra Club.”
8 (Order No. PSC-14-0696-FOF-EU at page 36). Apparently ignoring the
9 Commission’s most recent order, SACE has now increased its proposal by
10 50 percent.

11
12 Q. What is Witness Bradley-Wright’s recommendation concerning DSM goals
13 for Gulf Power?

14 A. Witness Bradley-Wright’s recommends establishing separate goals
15 specifically for low-income residential customers of 133 GWh- a level over
16 50 percent higher than Gulf’s current goals for all customer classes. His
17 testimony is unclear as to whether these goals are incremental to those
18 proposed by Witness Grevatt, or if these GWh values are included in
19 Witness Grevatt’s GWh goal numbers.

20
21 Q. What is the basis for Witness Bradley-Wright’s goal recommendations?

22 A. Witness Bradley-Wright’s low-income goal proposal is based on Witness
23 Grevatt’s partial (and flawed) effort to calculate a TRC-based Achievable
24 Potential that he ultimately abandons for a simple 1.5 percent of sales
25 target. Witness Bradley-Wright takes Witness Grevatt’s partially

1 developed achievable potential estimates and simply multiplies them by
2 the percentage of Gulf's population which Witness Bradley-Wright deems
3 to be "low-income." In addition to being overly simplistic in method, his
4 back-of-the-envelope calculation completely ignores the robust process of
5 evaluating each cost-effective measure's applicability across the
6 residential sector, existing penetration of these measures, and likely
7 adoption based on incentive levels and customer preference.

8
9 Q. Wouldn't low-income customers benefit from the bill savings that result
10 from this level of goal?

11 A. Perhaps, but they would also be paying for the programmatic expenditures
12 necessary to reach those goals. And, since these goals are spread over
13 ten years, the majority of those low-income customers would see
14 significant bill increases for several years until they could be served by the
15 programs, even if they were willing participants. A common challenge with
16 low-income customers is willingness to participate in programs, so a not-
17 insignificant percentage of this customer demographic would likely
18 experience significant cost increases with no offsetting energy savings.
19 Witness Bradley-Wright totally ignores this impact in his proposal. Yet,
20 this is the kind of cross-subsidization impact on customers that results
21 from goals that do not consider rate impact and why use of RIM protects
22 all customers, whether they voluntarily participate in a program or not.

23
24
25

1 Q. What is the basis for your conclusion that a not-insignificant percentage of
2 low-income customers would not participate in a low-income efficiency
3 program?

4 A. It has been Gulf's experience that 100 percent (or even large majority)
5 program participation is not achievable – even if measures are given away
6 for free. Some customers are reluctant to allow the badged program
7 representatives into their homes to install measures, some don't want to
8 take the time needed to have the measures installed, and others just
9 downright decline the offering.

10
11 Q. Do you agree with SACE's proposal to set separate goals for low-income
12 programs?

13 A. No. Gulf does support an intentional focus on overcoming participation
14 barriers with an appropriately structured low-income program design, but
15 setting a separate goal for this customer demographic is unnecessary.
16 Gulf has successfully executed a pro-actively targeted low-income
17 program since 2011 and intends to continue focusing educational and
18 energy efficiency support in this market without separate goals.

19
20 Q. What do you mean by an appropriately structured program design?

21 A. In the case of low-income, an appropriately structured program design is
22 one that attempts to reach as many qualifying customers as possible,
23 while also seeking to minimize the cross-subsidies which are inherent in
24 low-income programs.

25

1 Q. Do Witness Bradley-Wright's proposals accomplish those objectives?

2 A. Quite the opposite. In addition to proposing exponentially high low-income
3 goals without any true analytical basis, he proposes programs which are
4 designed to achieve what he describes as "deeper savings."

5

6 Q. What does Witness Bradley-Wright mean by reference to "deeper
7 savings?"

8 A. Although his testimony in that regard is quite vague, it appears that he is
9 proposing widespread deployment of programs which offer larger scale,
10 high-dollar, improvements such as HVAC equipment replacement,
11 insulation and water heaters at no, or very minimal cost to the low-income
12 customer.

13

14 Q. Do you have any concerns with Witness Bradley-Wright's "deeper
15 savings" proposal?

16 A. Yes, I do. Aside from cost, which could be astronomical even if only a
17 modest percentage of customers participate, it would create
18 unprecedented levels of cross-subsidization. These cross-subsidies
19 would be borne by all customers, including many of the same low-income
20 customers that Witness Bradley-Wright ostensibly seeks to protect.

21

22

23

24

25

1 Q. Witness Bradley-Wright also recommends that the Commission direct the
2 utilities to provide meaningful program participation opportunities for low-
3 income customers in all housing types, including multi-family housing and
4 manufactured homes. Do you have any observations regarding this
5 recommendation?

6 A. Yes. If Witness Bradley-Wright is under the impression that customers
7 living in multi-family housing and manufactured homes are excluded from
8 participating in Gulf Power's low-income program, he is simply mistaken in
9 that regard. The Company's current low-income program is open to all
10 qualifying customers, regardless of housing type.

11
12 Q. Earlier you referenced Gulf's low-income program. Can you please
13 describe the program?

14 A. Yes. Since 2011, Gulf has offered a low-income program called
15 Community Energy Saver that is targeted to geographic areas with high
16 concentrations of lower-income customers. This program provides
17 educational information and tips on conserving energy in addition to no-
18 cost direct installation of several energy and water savings measures
19 including energy efficient light bulbs, water heater pipe wrap/temperature
20 adjustment, low-flow showerhead, faucet aerators and central HVAC air
21 filters. Since the program's inception, Gulf has served over 21,000
22 customers, representing over 15 percent of the eligible customer base.
23 Gulf is proud of the success it has had with the Community Energy Saver
24 program. Indeed, Witness Bradley-Wright commends the Company for its
25 success. These achievements occurred in the absence of separate goals

1 for low-income programs, and Gulf Power sees no need to establish
2 separate goals in the next goals cycle.

3

4 Q. Does Gulf Power intend to maintain a low-income program during the next
5 goals cycle?

6 A. Absolutely. Gulf recognizes and agrees with the Commission's support of
7 DSM programs designed specifically for low-income customers. While
8 Gulf has not made any final decisions as to the nature of a proposed low-
9 income program going forward, Gulf fully intends to include a well-
10 designed low-income program in its proposed 2020 DSM Plan.

11

12 **II. Appropriate Cost Effectiveness Test and Screen for Free-Ridership**

13

14 Q. Do you agree with the intervenor witnesses' contention that the RIM test is
15 not a cost effectiveness test?

16 A. Absolutely not. The RIM test is widely recognized as a valid cost
17 effectiveness test. Like each of the standard tests used throughout the
18 industry, the RIM and TRC test and Participant Cost test (PCT) evaluate
19 benefits and costs from different perspectives. Florida regulators adopted
20 the RIM, TRC and PCT standards when establishing requirements for
21 DSM evaluations in the late 1980's with the publication of the "Florida
22 Public Service Commission Cost Effectiveness Manual for Demand Side
23 Management Program and Self-Service Wheeling Proposals" (DSM
24 Manual). Importantly, the RIM test measures the rate impact for all
25 customers – participants as well as non-participants (who represent the

1 majority of rate-paying customers). The RIM test assesses any cross-
2 subsidy that is imposed on non-participants when the cost of demand-side
3 management programs exceeds the benefit of utility cost savings. The
4 DSM Manual provides very clear guidance on how the RIM test is used to
5 evaluate cost-effectiveness of DSM initiatives. Use of the RIM test has
6 served Florida customers well over many years by supporting significant
7 conservation results, while ensuring that non-participating customers are
8 not harmed through cross-subsidization. Witness Deason speaks at
9 length regarding the Commission's precedent and policy surrounding use
10 of the RIM test.

11
12 Q. Do you agree with Witness Grevatt's characterization of lost revenues as
13 not actually being a cost?

14 A. No. Again, Witness Grevatt is simply wrong in his understanding of the
15 RIM test. A simple reading of the Florida Commission's own DSM
16 Manual, which is incorporated by reference in Rule 25-17.008, F.A.C.,
17 clearly states that lost revenues are considered to be a cost when
18 calculating the benefit cost ratio for the RIM test. A basic understanding of
19 utility ratemaking also reinforces the fact that unrecovered revenue
20 requirements resulting from implementation of utility sponsored DSM
21 programs represents a very real cost that is ultimately borne by
22 customers. By application of the RIM test, these and other program
23 implementation costs, including customer incentives, can be tested
24 against the resulting utility benefits in the form of avoided generation,
25 transmission and distribution costs in order to ensure all customers

1 benefit, whether or not they participate in the DSM program. This is why
2 the RIM test is sometimes referred to as the “no losers test.”

3

4 Q. Does the treatment of lost revenues as a cost impact the TRC test?

5 A. No. As discussed earlier, each of the tests measures the costs and
6 benefits from a different perspective. In the case of TRC, only the utility’s
7 program implementation and participant’s equipment costs are considered
8 in comparison to the utility avoided costs savings. This test does not
9 provide any indication of rate pressure resulting from unrecovered
10 revenue requirements or any cross-subsidy between participants and non-
11 participants. So, recognizing that TRC does not account for all costs, it
12 provides one perspective of whether the utility and customer base as a
13 whole may benefit. However, singular reliance on this test results in
14 winners and losers. Ideally, goals and programs would pass the RIM,
15 PCT and TRC tests to ensure an initiative is cost effective from all
16 perspectives and, as a practical matter, most initiatives that pass RIM also
17 pass TRC. By setting goals based on RIM, the Commission is ensuring
18 goals are cost-effective from all perspectives.

19

20 Q. What is your response to Witness Grevatt’s argument that the RIM test is
21 not applied to supply side investments?

22 A. In name, he is correct. However, that is only because the RIM test
23 methodology is typically only applied in demand-side evaluations. Supply-
24 Side evaluations undergo the same process, except there are no lost
25 revenues or non-participants to consider. Unlike when comparing a DSM

1 option to a supply option, there is no change in sales when comparing one
2 supply-side option to another. Since sales are the same, the lowest cost
3 supply-side alternative translates to the lowest rate impact, even when
4 rates go up. So, in the same way that relying on the RIM test for DSM
5 ensures rates are lower than they would otherwise be, supply-side
6 evaluations are seeking the same result.

7
8 Q. How do you reconcile Witness Grevatt's statement that no other states
9 rely primarily on the RIM test?

10 A. Each state has made a decision regarding the methods and process for
11 establishing DSM goals, to the extent they have one, based on their own
12 unique circumstances. Whether or not a state relies primarily on the RIM
13 test, even Witness Grevatt acknowledges several states do consider the
14 RIM test as a means of limiting upward rate pressure resulting from TRC-
15 based DSM spending.

16
17 Q. What are the intervenor witness recommendations with regard to
18 addressing free-ridership in this proceeding?

19 A. Both witnesses disagree with utilizing a two-year payback screen to
20 address free-ridership in this goal setting process. They argue that it is
21 not supported by any empirical evidence, that it ignores the underlying
22 premise for utility-sponsored energy efficiency, that it contradicts the
23 utilities' own Achievable Potential analysis, and that it is unnecessary
24 because naturally occurring adoption already accounts for free ridership.

25

1 Q. Do you agree with their recommendations?

2 A. No. As explained in more detail by Witness Deason, use of the two-year
3 payback screen has been a longstanding practice endorsed time and time
4 again by the Florida Commission as an appropriate means of addressing
5 free-ridership in this goal setting process. It is a common sense approach
6 to avoiding DSM spending that all customers must bear for participant cost
7 saving opportunities that have a relatively short economic payback.

8

9 Q. Witness Grevatt argues that use of the two-year payback criterion
10 contradicts the utilities' own Achievable Potential analysis. Is that valid?

11 A. No. Witness Grevatt seems to assume that there is some magical market
12 transformation that occurs at two-year payback such that 100 percent of
13 customers adopt energy efficiency measures. No FEECA Utility has made
14 such a claim. As mentioned previously, it has been Gulf's experience that
15 no measure, even when provided for free, can achieve 100 percent
16 adoption. The two-year payback screen eliminates measures with a short
17 payback based on a common sense notion they are likely adopted at a
18 higher rate simply due to the economic value proposition and therefore
19 have higher free-ridership than longer payback measures.

20

21 Q. Finally, Witness Grevatt claims that free ridership is already accounted for
22 by naturally occurring adoption. Is this the case?

23 A. No. As Witness Herndon explains, naturally occurring adoption and free
24 ridership are two completely different things in the context of the
25 Achievable Potential analysis. Even the Arkansas study that Witness

1 Grevatt references at page 41 of his testimony identifies these as separate
2 influences on energy efficiency potential.

3
4 **III. Other Miscellaneous Critiques of Market Potential Study**

5
6 Q. Witness Grevatt contends that Gulf and other utilities inappropriately
7 limited incentives paid to customers to a level that resulted in a two-year
8 payback. Do you agree?

9 A. No. Incentives must be limited in some fashion, and the establishment of
10 a two-year payback level for determining the maximum incentives
11 provides a consistent economic value proposition for all measures that are
12 cost-effective. Not limiting the incentive would result in excessive
13 spending which would be borne by all customers. Utilizing a payback
14 approach ensures consistency across measures and minimizes excessive
15 spending.

16
17 Q. Witness Grevatt implies that Gulf Power may have failed to re-assign
18 savings in the Economic Potential phase when higher tier measures were
19 screened out because they did not pass the cost effectiveness test. Does
20 this apply to Gulf?

21 A. No. As discussed in my direct testimony and that of Nexant Witness
22 Herndon, once Gulf completed the cost-effectiveness screening of
23 measures, Nexant re-calculated the Technical Potential of the remaining
24 cost-effective measures, thus producing the Economic Potential. This
25 step replaced the savings potential associated with any failing measure

1 with the savings potential of the next applicable passing measure.

2 Witness Herndon provides additional explanation in his rebuttal testimony
3 regarding how the measures were re-stacked to determine Economic
4 Potential MW and GWh.

5

6 Q. Witness Grevatt identifies administrative cost assumptions used for FPL
7 and implies that these costs are too high for FPL and perhaps other
8 utilities. Please respond to the issue of administrative cost assumptions
9 for Gulf Power.

10 A. Gulf utilized the administrative cost assumptions provided by Nexant in
11 calculating the maximum incentives and overall cost-effectiveness for
12 energy efficiency measures. These cost assumptions are based on actual
13 utility program costs as identified by Nexant and are discussed further by
14 Witness Herndon in his direct and rebuttal testimony. This approach is
15 reasonable for Gulf's evaluation, as Gulf does not have program
16 experience with many of the measures evaluated in this study.

17

18 Q. Witness Grevatt contends that the utilities should have used marginal line
19 loss rates rather than average line loss rates in calculating avoided costs.
20 Which line loss rates did Gulf Power use in its evaluations?

21 A. Gulf utilized line loss rates at peak load conditions in its evaluations.
22 These rates are appropriate as the impact of demand reductions from
23 DSM are based on seasonal peak load values. So, to the extent this is
24 what witness Grevatt refers to as "marginal rates," Gulf's analysis is
25 consistent with his recommendations.

1 **IV. Conclusions**

2 Q. Should the Commission adopt the Intervenor witnesses' recommendations
3 in this docket?

4 A. No. The Intervenor's recommendations in this docket lack thoughtful
5 analysis, do not reflect consideration of the utility planning process as
6 required by FEECA and Commission rules, and contain broad
7 generalizations based on DSM policies of other jurisdictions without any
8 regard to Florida-specific conditions or requirements. Further, while they
9 are quick to criticize the processes used by Gulf and Florida policies, their
10 critiques lack any reasonable solutions. Gulf's proposed goals were
11 developed utilizing a rigorous process that reflects the most recent
12 planning assumptions, meet the requirements of FEECA and Commission
13 rules, and should be adopted by this Commission.

14
15 Q. Does this conclude your testimony?


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

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ESCAMBIA)

Docket No. 20190016-EG

Before me the undersigned authority, personally appeared John N. Floyd, who being first duly sworn, deposes, and says that he is the Manager of Strategy and Market Intelligence of Gulf Power Company, a Florida corporation, that the foregoing is true and correct to the best of his knowledge, information, and belief. He is personally known to me.



John N. Floyd
Manager of Strategy and Market Intelligence

Sworn to and subscribed before me this 12th day of July, 2019.



Notary Public, State of Florida at Large

 **MELISSA DARNES**
MY COMMISSION # FF 912698
EXPIRES: December 17, 2019
Bonded Thru Budget Notary Services

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Commission Review of Numeric**)
Conservation Goals (Gulf Power Company))

Docket No.: 20190016-EG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 12th day of July, 2019 to the following:

Earthjustice
Bradley Marshall
Bonnie Malloy
Jordan Luebkmann
111 S. Martin Luther King Jr. Blvd.
Tallahassee, FL 32301
bmalley@earthjustice.org
bmarshall@earthjustice.org
jluebkmann@earthjustice.org
flcaseupdates@earthjustice.org

Office of Public Counsel
J.R. Kelly/P. Christensen
T. David/A. Fall-Fry
c/o The Florida Legislature
111 W. Madison Street,
Room 812
Tallahassee, FL 32399-1400
christensen.patty@leg.state.fl.us
kelly.jr@leg.state.fl.us
david.tad@leg.state.fl.us
fall-fry.mireille@leg.state.fl.us

Office of the General Counsel
Margo DuVal
Rachael Dziechciarz
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
mduval@psc.state.fl.us
RDziehc@psc.state.fl.us


Florida Department of Agriculture and
Consumer Services
Kelley F. Corbari
Allan J. Charles/Joan T. Matthews
Brenda Buchan
The Mayo Building
407 South Calhoun Street, Suite 520
Tallahassee, FL 32399
Kelley.Corbari@FreshFromFlorida.com
Allan.Charles@freshfromflorida.com
Joan.Matthews@freshfromflorida.com
Brenda.Buchan@freshfromflorida.com
Terryann.Adkins-Reid@freshfromflorida.com

Southern Alliance for Clean Energy
c/o George Cavros, Esq.
120 East Oakland Park Blvd.
Fort Lauderdale, FL 33334
george@cleanenergy.org

Florida Industrial Power Users Group
c/o Moyle Law Firm
Jon C. Moyle, Jr.
Karen A. Putnal
Ian E. Waldick
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com
iwaldick@moylelaw.com
mqualls@moylelaw.com

Stephanie U. Eaton
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
seaton@spilmanlaw.com

Derrick Price Williamson
Barry A. Naum
Spilman Thomas & Battle
1100 Bent Creek Boulevard
Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com


RUSSELL A. BADDERS
VP & Associate General Counsel
Florida Bar No. 007455
Russell.Badders@nexteraenergy.com
Gulf Power Company
One Energy Place
Pensacola FL 32520-0100
(850) 444-6550

STEVEN R. GRIFFIN
Florida Bar No. 0627569
srg@beggsllane.com
Beggs & Lane
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451