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# Public Service Commission

December 17, 2019

Mr. Ansley Watson, Jr.  
Macfarlane Ferguson & McMullen  
PO Box 1531  
Tampa, FL 33601-1531  
[aw@macfar.com](mailto:aw@macfar.com)

**STAFF'S FIRST DATA REQUEST  
VIA US MAIL & EMAIL**

**Re: Docket No. 20190210-GU - Approval of Demand Side Management Plan, by Peoples Gas System.**

Dear Mr. Watson:

By this letter, Commission staff requests that Peoples Gas System (PGS or Utility) provide responses to the following data requests:

1. Please identify the total projected annual bill impact on customers' monthly bills for all of the proposed residential and commercial demand-side management (DSM) programs.
2. Please provide the program description and program standards for each of the current Commission-approved residential and commercial DSM programs.
3. For each of the proposed residential and commercial DSM programs that are being renamed, please complete the table below by indicating the current Commission approved DSM program name, and by describing why each program was renamed.

<b>(Residential/Commercial)</b>		
<b>Commission Approved DSM Program Name</b>	<b>Proposed DSM Program Name</b>	<b>Explanation</b>

4. a. Please complete the table below by identifying each of the proposed residential and commercial DSM programs that fail the Participants Test (PCT) and/or the Gas Rate Impact Measure (G-RIM) Test, and by providing a possible solution to achieve passing results, if any.

<b>(Residential/Commercial)</b>			
<b>Failing Proposed DSM Program</b>	<b>PCT Result</b>	<b>G-RIM Test Result</b>	<b>Possible Solution</b>

- b. For each proposed failing program, please explain why the program should be approved as part of the Utility's DSM plan.

5. a. Please complete the table below by identifying each of the proposed residential and commercial DSM programs that are projected to result in zero savings, and by describing the reason(s) for this result.

<b>(Residential/Commercial)</b>	
<b>Proposed DSM Program</b>	<b>Reason(s) for Zero Savings</b>

- b. For each proposed program, please explain why the program should be approved as part of the Utility's DSM plan.

6. a. Please complete the table below by identifying each of the proposed residential and commercial DSM programs with no projected participation, and by describing the reason(s) for this result.

<b>(Residential/Commercial)</b>	
<b>Proposed DSM Program</b>	<b>Reason(s) for Zero Projected Participation</b>

- b. For each proposed program, please explain why the program should be approved as part of the Utility's DSM plan.

7. Please explain in detail the -19.192 and -5.603 PCT results for the Residential-Replacement and Commercial-Replacement Range/Cooktop Programs, respectively.

8. For each of the proposed residential and commercial DSM programs, please complete the table below by identifying which programs are load building programs, and which programs are load reduction programs.

<b>(Residential/Commercial)</b>	
<b>Proposed DSM Program</b>	<b>Load Building or Load Reduction?</b>

9. Please refer to the Executive Summary of the Utility’s 2019-2028 Demand Side Management Plan, Bates-Stamped page 4, which identifies the sources that were used to develop the data, costs, and assumptions for this plan.
- a. Please explain why PGS used the 2015 Residential Energy Consumption Survey, as published by the United States Energy Information Administration. As part of your response, please explain how this information was used, and whether the information that the Utility used in this survey is the most current available.
  - b. Please explain why PGS used the 2012 Commercial Building Energy Consumption Survey, as published by the United States Energy Information Administration. As part of your response, please explain how this information was used, and whether the information that the Utility used in this survey is the most current available.
  - c. Please explain why PGS used the 2014 Building America House Simulation protocols, as published by the National Renewable Energy Laboratory. As part of your response, please explain how this information was used, and whether the information that the Utility used in this survey is the most current available.
10. Please refer to the DSM Program Cost Effectiveness Summary on Bates-Stamped page 11 to answer the following questions:
- a. Please explain in detail how the Utility ensured that all programs identified were cost effective as a whole.
  - b. Please identify all measures for residential programs that were bundled for the purpose of evaluating cost effectiveness.
  - c. Please identify all measures for commercial programs that were bundled for the purpose of evaluating cost effectiveness.
11. Please provide the electronic file(s) with the formulas intact and the cells unlocked that were used to calculate the G-RIM and PCT values shown on Bates-Stamped page 11.

12. Please refer to Bates-Stamped page 12 addressing the cost and impact of the proposed DSM Plan; pages 3 and 6 from Order No. PSC-2019-0499-FOF-GU, Final Order Approving Natural Gas Conservation Cost Recovery Amounts and Establishing Natural Gas Cost recovery Factors for January through December 2020 (2019 Final Order); and to page 6 from the testimony of Mark R. Roche, filed in Docket No. 20190004-EG, on August 9, 2019, to answer the following questions:
  - a. On page 3 of the 2019 Final Order, the Commission approved a total cost recovery amount for PGS of \$19,577,952 for 2020, which according to the testimony of witness Mark. R. Roche, did not include the cost of the Utility's two new audit programs. Please explain in detail why the projected estimated cost of \$18,217,208 for 2020 shown on Bates-Stamped page 12, which includes the costs of the two new programs, is lower than the Commission-approved clause recovery amount from the 2019 Final Order (without the cost of two new programs).
  - b. On page 6 of the 2019 Final Order, the Commission approved a cost recovery factor for the RS, RS-SG, and RS-GHP rate classes of \$0.10948 per therm for 2020, which would result in a monthly charge of \$2.19 for 20 therms of use. As reflected on Bates-Stamped page 12, the Utility is estimating a monthly charge of \$2.86 for 20 therms of use. Please explain in detail the reason for the estimated change (from \$2.19 to \$2.86), in light of lower projected costs for the period.
  - c. Please provide a breakdown (by cost type and by program) of the "DSM Plan Cost" for each year reflected on Bates-Stamped page 12.
13. Please refer to Bates-Stamped pages 22-24 addressing the Residential Customer Assisted Energy Audit Program to answer the following questions:
  - a. Referencing column (a) on page 24, under the column heading "Total Number of Customers," please identify each and every forecast and assumption relied upon to reflect a steady growth of customers through 2028.
  - b. Referencing column (c) on page 24, under the column heading "Annual Number of Program Participants," please identify each and every methodology and assumption used to develop projections through 2028.
  - c. Referencing column (c) on page 24, under the column heading "Annual Number of Program Participants," please explain in detail how PGS developed its projections through 2028. Please also explain in your response why the projection for all periods beyond 2021 remains at 4,500 participants per year.

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- d. Referencing column (d) on page 24, under the column heading "Cumulative Penetration Level," please identify and describe what limiting factors or constraints impact penetration levels, considering that all customers are eligible to participate in the program.
14. Please refer to Bates-Stamped pages 83-85 addressing the Commercial Walk-Through Energy Audit Program to answer the following questions:
- a. Please explain how the Utility developed its projected administrative cost per audit of \$180, as shown on page 84. As part of your response, please explain why the program for residential customers is projected to have an administrative cost per audit of \$10, as shown on page 22.
- b. Referencing column (a) on page 85, under the column heading "Total Number of Customers," please identify each and every forecast or assumption relied upon to reflect a steady growth of customers through 2028.
- c. Referencing column (c) on page 85, under the column heading "Annual Number of Program Participants," please explain in detail how the Utility developed its projections through 2028. As part of your response, please explain why the projection for all periods beyond 2021 remains at 500 participants per year.
- d. Referencing column (d) on page 85, under the column heading "Cumulative Penetration Level," please explain in detail why the Utility projects a relatively modest 9.9 percent level in 2028, considering that all customers are eligible to participate in the program.

Please file all responses electronically no later than **January 17, 2020**, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20190210-GU). If you have any questions, please contact me by phone at (850) 413-6592, or by email at [tthomps@psc.state.fl.us](mailto:tthomps@psc.state.fl.us).

Sincerely,



Takira Thompson  
Engineering Specialist

TTT/jp

cc: Office of Commission Clerk (Docket No. 20190210-GU)  
Andrew M. Brown – Macfarlane Ferguson & McMullen  
Paula Brown/Kandi M. Floyd – Regulatory Affairs  
J.R. Kelly/Mireille Fall-Fry – Office of Public Counsel