

# Hopping Green & Sams

Attorneys and Counselors

February 24, 2020

**VIA: ELECTRONIC FILING**

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

Re: Approval of Demand Side Management Plan for JEA

Dear Mr. Teitzman:

Attached for filing on behalf of JEA is a Petition for Approval of Demand Side Management Plan, together with the company's proposed plan.

Thank you for your assistance in connection with this matter.

Sincerely,



Brooke E. Lewis

**BEFORE THE PUBLIC SERVICE COMMISSION**

In re: Petition of JEA for approval of demand side management plan.

DOCKET NO. \_\_\_\_\_

FILED: February 24, 2020

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**JEA'S PETITION FOR APPROVAL OF DEMAND SIDE MANAGEMENT PLAN**

Pursuant to Sections 366.81 and 366.82, Florida Statutes ("F.S."), and Rule 25-17.0021, Florida Administrative Code ("F.A.C."), JEA petitions the Florida Public Service Commission to approve the demand side management plan provided as Exhibit "A" to this Petition and incorporated by reference herein. In support, JEA states:

1. The name and address of the affected agency are: Florida Public Service Commission, 4075 Esplanade Way, Tallahassee, Florida 32399.
2. The name and address of the petitioner are: JEA, 21 West Church Street, Jacksonville, Florida 32202.
3. The persons to whom orders, notices, pleadings, motions and other documents for JEA should be served are:

Donald Wucker  
Management of Demand Side  
Management Portfolio  
21 West Church Street  
Jacksonville, FL 32202  
[wuckdp@jea.com](mailto:wuckdp@jea.com)

Gary V. Perko  
Brooke E. Lewis  
Hopping Green & Sams, P.A.  
119 S. Monroe St., Suite 300  
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[gperko@hgslaw.com](mailto:gperko@hgslaw.com)  
[blewis@hgslaw.com](mailto:blewis@hgslaw.com)

4. JEA is a utility within the meaning of Section 366.82(1), F.S., and is therefore subject to the Commission's jurisdiction under the Florida Energy Efficiency and Conservation Act ("FEECA").

5. Pursuant to Section 366.82(6), F.S., the Commission must review the conservation goals of each utility subject to FEECA at least every five years. In accordance with that requirement, the Commission established JEA's residential and commercial/industrial numeric conservation goals for the 2020 through 2024 period in Order No. PSC-2019-0509-FOF-EG issued in Docket No. 20190020-EG.

6. Rule 25-17.0021(4), F.A.C., requires each FEECA utility to submit a demand side management plan designed to meet the utility's approved goals within 90 days of a final order establishing the goals. The demand side management plan provided as Exhibit "A" to this Petition includes the information required in Rule 25-17.0021(4), F.A.C.

7. JEA is not aware of any disputed issues of material fact.

8. JEA is entitled to relief pursuant to Sections 366.82, F.S. and Rule 25-17.0021, F.A.C.

**WHEREFORE**, JEA respectfully requests that the Commission approve the demand side management plant provided as Exhibit "A" to this Petition.

RESPECTFULLY SUBMITTED this 24<sup>th</sup> day of February, 2020.

HOPPING GREEN & SAMS, P.A.

By: /s/ Brooke E. Lewis

Gary V. Perko  
Brooke E. Lewis  
Hopping Green & Sams, P.A.  
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*Attorneys for JEA*

**I. PROGRAM GOALS  
AND  
IMPACT**

BACKGROUND: The Florida Energy Efficiency and Conservation Act (FEECA) requires the Florida Public Service Commission (PSC) to adopt appropriate goals designed to increase the conservation of expensive resources, such as petroleum fuels, to reduce and control the growth rates of electric consumption and weather-sensitive peak demand. Pursuant to Section 366.82(6), F.S., the PSC must review the conservation goals of each utility subject to FEECA at least every five years. Pursuant to that requirement, the Commission has established JEA's residential and commercial/industrial numeric conservation goals for the 2020 through 2024 period. As stated in Order No. PSC-2019-0509-FOF-EG issued November 26, 2019; the Commission found "that it is in the public interest to continue with the goals set in the last FEECA proceeding pursuant to the 2014 Goalsetting Order."

During the 2014 hearings, the commission approved a stipulation to establish goals for JEA based upon the savings associated with the core measures JEA planned to offer its electric customers for the 2015 through 2024 period. A copy of this stipulation can be found in Order No. PSC-14-0696-FOF-EU issued December 16, 2014.

In accordance with this order, JEA's final PSC-established annual goals, along with JEA's projected annual DSM peak demand and energy reductions (corresponding to the programs discussed in subsequent sections of this document) are presented in Tables I-1, I-2 and I-3. The rate impact for a typical residential customer is shown in Table I-4.

## A. GOALS & IMPACT

Table I-1

Residential Market Segment Demand and Energy Data

YEAR	WINTER PEAK MW REDUCTION			SUMMER PEAK MW REDUCTION			GWH ENERGY REDUCTION		
	PROPOSED PLAN	COMMISSION APPROVED GOAL	% VARIANCE	PROPOSED PLAN	COMMISSION APPROVED GOAL	% VARIANCE	PROPOSED PLAN	COMMISSION APPROVED GOAL	% VARIANCE
2020	0.99	0.96	3%	3.53	0.94	276%	16.48	2.50	559%
2021	0.99	0.96	3%	3.53	0.94	276%	16.48	2.50	559%
2022	0.99	0.96	3%	3.53	0.94	276%	16.48	2.50	559%
2023	0.99	0.96	3%	3.53	0.94	276%	16.48	2.50	559%
2024	0.99	0.96	3%	3.53	0.94	276%	16.48	2.50	559%
Total	4.94	4.80	3%	17.65	4.70	276%	82.42	12.50	559%

Note: Variance calculated utilizing the formula: (Actual -Goal) / Goal, and is based on unrounded values

Table I-2

Commercial Market Segment Demand and Energy Data

YEAR	WINTER PEAK MW REDUCTION			SUMMER PEAK MW REDUCTION			GWH ENERGY REDUCTION		
	PROPOSED PLAN	COMMISSION APPROVED GOAL	% VARIANCE	PROPOSED PLAN	COMMISSION APPROVED GOAL	% VARIANCE	PROPOSED PLAN	COMMISSION APPROVED GOAL	% VARIANCE
2020	0.013	0.007	82%	0.35	0.14	150%	2.13	0.08	2563%
2021	0.013	0.007	82%	0.35	0.14	150%	2.13	0.08	2563%
2022	0.013	0.007	82%	0.35	0.14	150%	2.13	0.08	2563%
2023	0.013	0.007	82%	0.35	0.14	150%	2.13	0.08	2563%
2024	0.013	0.007	82%	0.35	0.14	150%	2.13	0.08	2563%
Total	0.064	0.035	82%	1.75	0.70	150%	10.65	0.40	2563%

Note: Variance calculated utilizing the formula: (Actual -Goal) / Goal, and is based on unrounded values

Table I-3

Total FEECA Demand and Energy Data

YEAR	WINTER PEAK MW REDUCTION			SUMMER PEAK MW REDUCTION			GWH ENERGY REDUCTION		
	PROPOSED TARGET	COMMISSION APPROVED GOAL	% VARIANCE	PROPOSED TARGET	COMMISSION APPROVED GOAL	% VARIANCE	PROPOSED TARGET	COMMISSION APPROVED GOAL	% VARIANCE
2020	1.0	1.0	3.5%	3.9	1.1	259%	18.6	2.6	621%
2021	1.0	1.0	3.5%	3.9	1.1	259%	18.6	2.6	621%
2022	1.0	1.0	3.5%	3.9	1.1	259%	18.6	2.6	621%
2023	1.0	1.0	3.5%	3.9	1.1	259%	18.6	2.6	621%
2024	1.0	1.0	3.5%	3.9	1.1	259%	18.6	2.6	621%
Total	5.0	4.8	3.5%	19.4	5.4	259%	93.1	12.9	621%

Note: Variance calculated utilizing the formula: (Actual -Goal) / Goal, and is based on unrounded values

Table I-4  
Residential Rate Impact

Estimated Impact for a Residential Customer Using 1,200 kWh/month	
Calendar Year	2020-2024
Percent Increase	0.29%
Current Monthly Cost	\$145.95
Monthly Impact	\$0.43
Current Annual Cost	\$1,751.40
Annual Impact	\$5.12

Rule 25-17.0021, F.A.C. requires each FEECA utility to submit a demand side management plan designed to meet the utilities approved goals within 90 days of a final order establishing the utility's goals. JEA's demand side management plan is provided in the following sections.

## **II. PROGRAM INTRODUCTION**

## II. PROGRAM INTRODUCTION

JEA's proposed Demand Side Management (DSM) Portfolio consists of four (4) residential programs, two (2) commercial programs:

### A. Residential Programs

- **Residential Energy Audit Program** uses auditors to examine homes, educate customers and make recommendations on low-cost or no-cost energy-saving practices and measures.
- **Residential Solar Water Heating** pays a financial incentive to customers to encourage the use of solar water heating technology.
- **Residential Net Metering** promotes the use of solar photovoltaic systems by purchasing excessive power from residential customers implementing these systems.
- **Neighborhood Efficiency Program** offers education concerning the efficient use of energy & water as well as the direct installation of an array of energy & water efficient measures at no cost to income qualified customers.

### B. Commercial Programs

- **Commercial Energy Audit Program** uses auditors to examine business, educate customers and make recommendations on low-cost or no-cost energy-saving practices and measures.
- **Commercial Net Metering** promotes the use of solar photovoltaic systems by purchasing excessive power from commercial customers implementing these systems.

### C. ECONOMIC PERFORMANCE OF DEMAND SIDE MANAGEMENT PROGRAMS

Table II-1  
 Summary of DSM Programs  
 Included in Proposed Plan  
 Period 2020-2024

DSM PROGRAM	Rate Impact Measure Test			Participant Test			Total Resource Cost Test		
	PV Total Benefits (\$000)	PV Total Costs (\$000)	B / C Ratio	PV Total Benefits (\$000)	PV Total Costs (\$000)	**B / C Ratio	PV Total Benefits (\$000)	PV Total Costs (\$000)	B / C Ratio
Residential Energy Audits	\$ 1,048	\$ 3,729	0.28	\$ 1,852	\$ 19	>99.99	\$ 1,048	\$ 2,122	0.49
Residential Solar Water Heating	\$ 15	\$ 32	0.46	\$ 27	\$ 33	0.82	\$ 15	\$ 38	0.39
Residential Net Metering	\$ 12,794	\$ 26,051	0.49	\$ 17,063	\$ 13,691	1.25	\$ 12,794	\$ 22,564	0.57
Neighborhood Efficiency Program	\$ 3,151	\$ 7,720	0.41	\$ 4,872	\$ 6	>99.99	\$ 3,151	\$ 3,185	0.99
Business Energy Audits	\$ 132	\$ 207	0.64	\$ 131	\$ 0.4	>99.99	\$ 132	\$ 100	1.32
Commercial Net Metering	\$ 2,067	\$ 2,793	0.74	\$ 1,767	\$ 1,815	0.97	\$ 2,067	\$ 3,055	0.68

\*\* >99 B/C Ratio, participants do not pay for these measures

## **D. PROGRAM MONITORING AND EVALUATION**

JEA will determine on a program-by-program basis the most cost effective evaluation method based on factors such as cost, participation levels, program performance, dollars invested, the level of uncertainty of measure performance, etc.

# **III. RESIDENTIAL CONSERVATION PROGRAMS**

### **III. RESIDENTIAL CONSERVATION PROGRAMS**

JEA's DSM Plan includes four (4) residential programs:

- A. Residential Energy Audits**
- B. Residential Solar Water Heating**
- C. Residential Net Metering**
- D. Neighborhood Efficiency Program - (low income homes)**

Each program is described in detail in the following sections.

## A. RESIDENTIAL ENERGY AUDIT PROGRAM

**Program Start Date:** Originally started in 1978 and continuing from 2020 thru 2024

### Policies and Procedures

JEA offers a home energy audit for all residential customers in the JEA service territory. This service is offered at no charge to our customers. A JEA representative will survey the home and then offer cost-effective ideas designed to help lower energy costs. Areas of the customers home that are inspected include: attic insulation, windows and caulking, weather stripping, water heaters, water temperature, air conditioning and heating system visual inspections, supply air & return air temperature readings, and refrigerator/freezer inspection. JEA representatives also use a wide variety of tools and literature for customer education during the inspection. No cost measures such as air conditioning & heating thermostat temperature settings, proper use of ceiling fans, water heater settings, refrigeration temperature settings, management of plug (vampire) loads, management of computer, monitor & printer loads, management of lighting systems and cleaning surfaces of heat exchangers are encouraged. In addition to the energy audit, we also offer free water management evaluations. The services listed above are available to JEA customers by contacting the JEA business office by phone or email.

### Participation Estimates for the Program

Year	Total Number of Customers	Total Number of Eligible Customers	Annual Number of Program Participants	Cumulative Penetration Level (%) Calculated
2020	424,939	424,939	4,500	1.1%
2021	431,420	431,420	4,500	2.1%
2022	437,973	437,973	4,500	3.1%
2023	444,544	444,544	4,500	4.0%
2024	450,901	450,901	4,500	5.0%

## Savings Estimates

<b>At the Meter</b>						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	200	0.100	0.100	900,000	450.0	450.0
2021	200	0.100	0.100	900,000	450.0	450.0
2022	200	0.100	0.100	900,000	450.0	450.0
2023	200	0.100	0.100	900,000	450.0	450.0
2024	200	0.100	0.100	900,000	450.0	450.0

<b>At the Generator</b>						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	208	0.104	0.104	934,200	467.1	467.1
2021	208	0.104	0.104	934,200	467.1	467.1
2022	208	0.104	0.104	934,200	467.1	467.1
2023	208	0.104	0.104	934,200	467.1	467.1
2024	208	0.104	0.104	934,200	467.1	467.1

## Impact Evaluation Plan

The home energy survey covers a wide range of cost-saving opportunities, including various behavioral and technological recommendations that may be implemented by the customer. A follow-up survey of participants would support the determination of what actions have been specifically implemented as a result of the energy audit. Using these results in conjunction with site-specific engineering estimates would likely be the most cost-effective method for evaluating program impacts. Alternatively, a statistically based analysis may be considered, depending on program participation levels actually experienced.

## **B. RESIDENTIAL SOLAR WATER HEATING**

**Program Start Date:** Originally started in 2002 and continuing from 2020 thru 2024

### **Policies and Procedures**

For the purposes of these procedures, “Participant” means any person or company that installs, fabricates, designs, constructs or otherwise supplies products and services to JEA customers under the Solar Incentive Program.

- All Participants must be pre-qualified by JEA. There is no provision for “retro-active” qualification. Completely fill-out the “Incentive Payment Request Form” and fax to 665-7386 for pre-approval. Approval or denial will be faxed back as soon as possible.
- JEA considers satisfaction of its customers to be of paramount importance. JEA will monitor the performance of all Participants for quality customer service and workmanship. If it is deemed that a Participant is not performing at a level JEA judges to be in its best interest, the Participant may be disqualified from participation in the program.
- JEA will only provide incentive payments for systems accepted by the customer as complete, in accordance with what they purchased from Participant, and in compliance with the requirements of the incentive program. JEA only provides incentives for customers who are switching from JEA electric water heating to solar water heating.
- The program will operate on a trust basis, so far as determining the percentage of local value in a project. JEA will trust that the Participants will honestly assess this parameter when submitting jobs for JEA acceptance. JEA will perform random audits of the percentage local value on all projects. Any Participant not accurately assessing local value may be disqualified from the solar incentive program.
- JEA must be notified by the Participant when a proposal is submitted to a customer for any Commercial project. JEA is to receive a copy of the technical aspects of the proposal. JEA must receive the commercial proposal within 5 business days of the customer placing an order.
- All customer proposals must clearly show the Full price of the system, the JEA Incentive and the Net price to the customer. The customer pays the Net price of the system to the Participant.
- The Participant is responsible to maintain any licenses, permits, inspections, and insurance required to perform work under this program. Licensed solar installers under Florida Statue 489.105 (3) (o) must install any solar energy system under this program<sup>1</sup>. It is the Participant’s responsibility to ensure they adhere to all laws, rules, and regulations that apply to the promotion, purchase, and installation of their solar energy systems.

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<sup>1</sup> See “Exception for Installation of Solar Systems”

- JEA does not warrant or guarantee any system sold by Participant under this program. JEA is not liable for any representation or warranty made by Participant to customers concerning quality of materials, workmanship or any projected energy savings. Participant further understands that JEA makes no warranties concerning materials and installation, expressed or implied, including warranties of merchantability or fitness for a particular purpose. Participant shall make no statements, representations or claims to customers inconsistent with this paragraph.
- Participant's representation of the program shall conform to this document. Participant shall have no right to use any JEA trademark, Service Mark or logo for advertising, marketing, or identification purposes except as JEA may provide on documents and materials JEA develops to support this program. All communication materials using or referring to JEA or the JEA Solar Incentive Program must be reviewed prior to use to ensure consistency of the JEA Brand. (Please allow 5 business days for review and approval of any submitted materials.)
- Participants may identify themselves as: "JEA Authorized Solar Participant" This language may only be used when accompanied by the clear identification of Participant's business name, in type at least as large as the language above.
- All medium temperature solar hot water systems/equipment must:
  - Be FSEC approved
  - Comply with all local building and electrical codes
  - Be installed by properly licensed and qualified personnel under Florida Statute 489.105 (3) (o).
  - Operate at not less than 700 BTU/ft<sup>2</sup>
  - Operate with a solar fraction not to exceed 80%
- JEA retains all Green Attributes associated with projects installed under this program.
- Complete paperwork must be submitted for timely incentive payments. Incomplete incentive forms and/or incomplete or missing supporting documentation may result in payment delays.

Documentation requirements are:

- Solar Hot Water Systems
  - Invoice to JEA
  - Copy of customer invoice
  - Completed Solar Certificate
  - Photographs of installation (collector and water heater)
  - Copy of approved Incentive Fund Request form
- It is the Participant's responsibility to ensure they adhere to all laws, rules, and regulations that apply to the promotion, purchase, and installation of their solar energy systems. Requirements for incentive payments do not supersede any of these laws, rules, or regulations.

## Incentives

<b>JEA Solar Power Incentives</b>	<b>Local Vendor</b>	<b>Non-local Vendor</b>
New Solar Residential Water Heating System (medium temp collector)	\$400 per install	\$400 per install
Restoration of Existing Solar Water Heating System to Working Order <sup>1</sup>	30% of total installed cost up to \$400	15% of total installed cost up to \$250
<p>Notes:</p> <ol style="list-style-type: none"> <li>1. For systems installed before April 22, 1997; Retrofits apply to solar hot water systems and exclude the hot water heater tank.</li> <li><del>2. There is a \$5,000 maximum incentive per project. This maximum may be waived by JEA based on business conditions, availability of funds, and projected residual funds required to fund the Program for the balance of the year. This potential waiver does not guarantee that 100% of the incentive will be available.</del></li> <li>3. If other incentives (rebates, grants, etc.) are used to fund a solar system, these funds combined with JEA funds cannot exceed the cost of the system. JEA requires the disclosure of other incentives at the time the Incentive Fund Request form and Solar Certificate are submitted.</li> <li>4. If a solar system is moved from its installed location JEA is to be notified prior to relocation. These systems are not eligible for additional solar incentive dollars.</li> <li>5. JEA does not provide incentives for gas water heaters.</li> </ol>		

### Exception for Installation of Solar Systems

The Solar Incentive Program Participant Guidelines indicated a solar license, under Florida Statute 489.105 (3) (o), as required for installing solar thermal systems. JEA will also accept installations by a licensed plumbing contractor, provided the contractor:

1. Obtain 3 continuing education units for the installation of solar thermal systems during each biennium. Or
2. Complete a training program through a manufacturer of solar thermal systems. Or
3. Complete a training program from a licensed solar contractor to install solar thermal systems.

JEA would prefer that the contractor be licensed under Florida Statute 489.105 (3) (o) and reserve the right to remove this provisional exception upon reasonable notice.

### Incentives to Third Parties

Effective immediately, all Solar Certificates must be signed by the JEA electric customer receiving the incentive.

For example:

If a JEA electric customer is installing a solar water heating system that is purchased as part of a package through a 3rd party, the incentive form must be signed by the JEA electric customer and NOT the 3rd party offering the package. As always, ALL INFORMATION must be on the incentive form prior to customer signature. All customer proposals must clearly show the Full price of the system, the JEA Incentive and the Net price to the customer. The customer pays the Net price of the system to the Participant (or 3rd party in this case). The customer receives the pink certificate copy.

For situations where the final JEA electric customer is unknown (builder spec houses for example), the 3rd party may be considered the customer for purpose of paying incentives.

### Participation Estimates for the Program

Year	Total Number of Customers	Total Number of Eligible Customers	Annual Number of Program Participants	Cumulative Penetration Level (%) Calculated
2020	424,939	424,939	2	0.00%
2021	431,420	431,420	2	0.00%
2022	437,973	437,973	2	0.00%
2023	444,544	444,544	2	0.00%
2024	450,901	450,901	2	0.00%

## Savings Estimates

At the Meter						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	2,322.3	0.475	0.420	4,645	1.0	0.8
2021	2,322.3	0.475	0.420	4,645	1.0	0.8
2022	2,322.3	0.475	0.420	4,645	1.0	0.8
2023	2,322.3	0.475	0.420	4,645	1.0	0.8
2024	2,322.3	0.475	0.420	4,645	1.0	0.8

At the Generator						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	2,410	0.493	0.436	4,821	1.0	0.9
2021	2,410	0.493	0.436	4,821	1.0	0.9
2022	2,410	0.493	0.436	4,821	1.0	0.9
2023	2,410	0.493	0.436	4,821	1.0	0.9
2024	2,410	0.493	0.436	4,821	1.0	0.9

## Impact Evaluation Plan

Utilizing participant pre-project and post-installation energy consumption data to conduct a statistical analysis to assess the program impacts will be the most cost effective evaluation method. Additional data such as weather data, building occupancy, operating hours, major equipment purchases and other data would be used with this methodology. Site specific engineering estimates will be considered as an alternative to statistical analysis if it is cost effective to develop them.

## C. RESIDENTIAL NET METERING PROGRAM

**Program Start Date:** Originally started in 2009

**Applicable Legacy Policy and Procedure for “Grandfathered” customers – Expires March 31, 2038, unless terminated earlier due to voluntarily withdrawal. See [https://www.jea.com/net\\_metering\\_program/](https://www.jea.com/net_metering_program/) for more on JEA’s Net Metering Program.**

JEA allows customer-owned renewable generation up to 2 MW under its Net Metering Policy. Proposed installations which are greater than 2 MW in capacity will be outside of this policy and would need a specific Purchased Power Agreement with JEA which will be based on avoided cost principles. The JEA net metering policy is primarily intended to facilitate generation from renewable energy sources to offset part or all of the customer’s energy requirements.

Net metering customers will be charged for the metered kWh received from JEA during each month and credited for the metered sent to JEA each month in accordance with Net Metering Policy Rates:

### Net Metering Policy Rates Summary

Generation Range	Energy (kWh) Received (Purchased) from JEA	Energy (kWh) Delivered (Sold) to JEA
Tier 1 - 10 kW or less	Retail Rate	Retail Rate
Tier 2 – over 10 kW and less than 50 kW	Retail Rate	Retail Rate
Tier 2 - 50 kW up to 100 KW	SS-1 Retail Rate	Retail Rate
Tier 3 – over 100 kW up to 2 MW	SS-1 Retail Rate	Fuel Rate

The billed kWh consumption for each billing period will be the amount of kWh received from JEA measured at the meter at the end of the billing period. Customers will be charged using the customer’s Retail Rate for energy, demand, fuel, environmental and conservation charges per kWh for the metered kWh received from JEA during each billing cycle. The customer will always pay the monthly customer charge and the Retail Rate plus taxes and fees based on the kWh that customer receives from JEA even if there is net zero consumption or net excess kWh exported to the grid during the billing cycle. Monetary credits for each billing period will be based on the kWh sent to JEA measured at the meter at the end of the billing period and the rate applicable to the customer’s system. If the credit for a billing period is larger than the charges for the kWh received from JEA, JEA will carry over the credit balance, less any included taxes, to the next billing period. JEA will not distribute a monthly payment for the credit balance. JEA will apply the credit balance to the electric service balance each billing period through the end of the calendar year. If at the end of the calendar year the customer has a credit balance on the customer’s JEA account related to their net metering service, the credit balance will be applied to any outstanding balance on the combined JEA customer account. JEA will then pay the customer the remaining account credit balance. JEA will also apply any credit balance to the final bill at the time the service agreement, or account, is closed and final billed. At the end of each year JEA will issue an IRS 1099-MISC tax form totalizing all monthly credits for the previous year to customers with total credits of \$600 or greater.

JEA reserves the right to monitor the aggregate load of all Net Metering connected to the JEA grid and at management's sole discretion institute aggregate load limits in the future that will limit the net metering customers by total MWs connected, date or other aggregate characteristics. Currently, an aggregate JEA system load limit of 10 MW is in place for Tier 1 – 3 Net Metering. JEA also reserves the right to develop specific rate classifications in the future that may have different cost recovery based rate structures than implied through net metering practices under this JEA Net Metering Policy.

In order to qualify for a net metered interconnection to JEA's distribution grid the customer's generation system must have a gross power rating that:

1. Does not exceed 90% of the customer's utility distribution service rating; and
2. Falls into one of the following ranges:
  - Tier 1 - 10 kW or less;
  - Tier 2 – greater than 10 kW and less than or equal to 100 kW;
  - Tier 3 – greater than 100 kW and less than or equal to 2 MW.
3. Does not result in annual energy (kWh) sent to the JEA grid that exceeds the customer's annual energy (kWh) obtained from the JEA grid.

The customer will retain any Renewable Energy Certificates (REC) associated with a customer's renewable generation. The customer will be required to install the system in accordance with JEA Rules and Regulations section 2.16 and Engineering & Construction Services Procedure ECS20202 902, as appropriate. The system must pass a JEA inspection prior to connection and operation. JEA will furnish, install, own and maintain metering equipment at the installation point capable of monitoring the flow of power from JEA to the customer and from the customer to JEA.

### Participation Estimates for the Program

Year	Total Number of Customers	Total Number of Eligible Customers	Annual Number of Program Participants	Cumulative Penetration Level (%) Calculated
2020	424,939	424,939	1,200	0.28%
2021	431,420	431,420	1,200	0.28%
2022	437,973	437,973	1,200	0.27%
2023	444,544	444,544	1,200	0.27%
2024	450,901	450,901	1,200	0.27%

## Savings Estimates

At the Meter						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	11,305	0.001	1.84	13,566,000	1.2	2,208.0
2021	11,305	0.001	1.84	13,566,000	1.2	2,208.0
2022	11,305	0.001	1.84	13,566,000	1.2	2,208.0
2023	11,305	0.001	1.84	13,566,000	1.2	2,208.0
2024	11,305	0.001	1.84	13,566,000	1.2	2,208.0

At the Generator						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	11,735	0.00	1.91	14,081,508	1.2	2,291.9
2021	11,735	0.00	1.91	14,081,508	1.2	2,291.9
2022	11,735	0.00	1.91	14,081,508	1.2	2,291.9
2023	11,735	0.00	1.91	14,081,508	1.2	2,291.9
2024	11,735	0.00	1.91	14,081,508	1.2	2,291.9

## Impact Evaluation Plan

Because the metering set-up determines net effects it is difficult to determine exact contributions from customer installed systems. As a result, utilizing solar net metering participant pre-project and post-installation energy consumption data to conduct a statistical analysis to assess the program impacts may be the most cost effective evaluation method. Additional data such as weather data, building occupancy, operating hours, major equipment purchases and other data would be used with this methodology. Site specific engineering estimates will be considered as an alternative to statistical analysis if it is cost effective to develop them.

## D. NEIGHBORHOOD ENERGY EFFICIENCY PROGRAM

**Program Start Date:** Originally started in 2008 and continuing from 2020 thru 2024

### Policies and Procedures

JEA offers a three-phase program for low income customers. Phase 1 provides installation of 15 electric and water conservation products as well as the energy education package of printed material and consultation with an energy audit on a door-to-door basis in targeted neighborhoods identified by the City as having more than 50% of the neighborhood population at or below 150% of the Federal Poverty Guidelines. Approximately 1,000 homes are completed per year.

While implementing Phase 1 work, JEA looks within these homes for those in need of attic insulation. JEA offers an additional service whereby we provide blown-in attic insulation to bring the home's insulation value up to an R38-value in accordance with DOE W AP standards at no cost to the owner which averages about 150 upgrades per year.

Phase 3 provides an Energy Efficient Home Maintenance kit of 12 electric and water conservation products for participants in a Housing Counseling workshop required for first time home buyers involved in the City's loan assistance programs for low to moderate income residents. Approximately 200 kits are provided annually.

### Participation Estimates for the Program

Year	Total Number of Customers	Total Number of Eligible Customers	Annual Number of Program Participants	Cumulative Penetration Level (%) Calculated
2020	424,939	127,482	1,350	1.1%
2021	431,420	129,426	1,350	2.1%
2022	437,973	131,392	1,350	3.1%
2023	444,544	133,363	1,350	4.0%
2024	450,901	135,270	1,350	5.0%

## Savings Estimates

At the Meter						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	1,044	0.370	0.550	1,409,400	499.5	742.5
2021	1,044	0.370	0.550	1,409,400	499.5	742.5
2022	1,044	0.370	0.550	1,409,400	499.5	742.5
2023	1,044	0.370	0.550	1,409,400	499.5	742.5
2024	1,044	0.370	0.550	1,409,400	499.5	742.5

At the Generator						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	1,084	0.384	0.571	1,462,957	518.5	770.7
2021	1,084	0.384	0.571	1,462,957	518.5	770.7
2022	1,084	0.384	0.571	1,462,957	518.5	770.7
2023	1,084	0.384	0.571	1,462,957	518.5	770.7
2024	1,084	0.384	0.571	1,462,957	518.5	770.7

## Impact Evaluation Plan

The neighborhood energy efficiency program includes a wide range of cost-saving measures, including various behavioral and technological recommendations that may be implemented by the customer. Using readily available direct installation data in conjunction with site-specific engineering estimates would likely be the most cost-effective method for evaluating program impacts.

**IV. COMMERCIAL  
CONSERVATION PROGRAMS**

## **IV. COMMERCIAL CONSERVATION PROGRAMS**

JEA's DSM Plan includes two (2) commercial programs:

- A. Commercial Energy Audits**
- B. Commercial Net Metering**

Each program is described in detail in the following sections.

## A. COMMERCIAL ENERGY AUDITS

**Program Start Date:** Originally started in 1978 and continuing from 2020 thru 2024

### Policies and Procedures

JEA offers a business energy audit for all commercial customers located in the JEA service territory. This service is offered at no charge to our customers and is available for all commercial rate classifications. As a part of this service a JEA representative will perform a rate evaluation, discuss demand strategies if relevant, and inspect the customers' business and then offer cost-effective ideas designed to help lower energy costs. Areas of the customers' business that are inspected include: insulation, windows, tinting, and caulking, weather stripping, water heating systems and water temperature, HVAC visual inspections, equipment and their controls, and refrigeration. JEA representatives also use a wide variety of tools and literature for customer education during the inspection. No cost measures such as air conditioning & heating thermostat temperature settings, water heater settings, refrigeration temperature settings, management of plug (vampire) loads, management of computer, monitor & printer loads, management of lighting systems and cleaning surfaces of heat exchangers are encouraged. In addition to the energy audit, we also offer free water management evaluations. The services listed above are available to JEA customers by contacting the JEA business office by phone or email. Online business energy audit services are also available online at <http://www.jea.com>

### Participation Estimates for the Program

Year	Total Number of Customers	Total Number of Eligible Customers	Annual Number of Program Participants	Cumulative Penetration Level (%) Calculated
2020	54,298	54,298	100	0.2%
2021	54,932	54,932	100	0.4%
2022	55,557	55,557	100	0.5%
2023	56,173	56,173	100	0.7%
2024	56,784	56,784	100	0.9%

## Savings Estimates

At the Meter						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	540	0.120	0.120	54,000	12.0	12.0
2021	540	0.120	0.120	54,000	12.0	12.0
2022	540	0.120	0.120	54,000	12.0	12.0
2023	540	0.120	0.120	54,000	12.0	12.0
2024	540	0.120	0.120	54,000	12.0	12.0

At the Generator						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	562	0.125	0.125	56,214	12.5	12.5
2021	562	0.125	0.125	56,214	12.5	12.5
2022	562	0.125	0.125	56,214	12.5	12.5
2023	562	0.125	0.125	56,214	12.5	12.5
2024	562	0.125	0.125	56,214	12.5	12.5

## Impact Evaluation Plan

The commercial energy audit program covers a wide range of cost-saving opportunities, including various behavioral and technological recommendations that may be implemented by the customer. A follow-up survey to participants would support the determination of what actions have been specifically implemented as a result of the energy audit. JEA anticipates combining these results in conjunction with deemed savings estimates as the most cost effective methodology. Site-specific engineering estimates will be considered if its cost effectiveness is warranted.

## B. COMMERCIAL NET METERING PROGRAM

**Program Start Date:** Originally started in 2009

**Applicable Legacy Policy and Procedure for “Grandfathered” customers – Expires March 31, 2038, unless terminated earlier due to voluntarily withdrawal. See [https://www.jea.com/net\\_metering\\_program/](https://www.jea.com/net_metering_program/) for more on JEA’s Net Metering Program.**

JEA allows customer-owned renewable generation up to 2 MW under its Net Metering Policy. Proposed installations which are greater than 2 MW in capacity will be outside of this policy and would need a specific Purchased Power Agreement with JEA which will be based on avoided cost principles. The JEA net metering policy is primarily intended to facilitate generation from renewable energy sources to offset part or all of the customer’s energy requirements.

Net metering customers will be charged for the metered kWh received from JEA during each month and credited for the metered kWh sent to JEA each month in accordance with Net Metering Policy Rates:

### Net Metering Policy Rates Summary

Generation Range	Energy (kWh) Received (Purchased) from JEA	Energy (kWh) Delivered (Sold) to JEA
<b>Tier 1 - 10 kW or less</b>	Retail Rate	Retail Rate
<b>Tier 2 – over 10 kW and less than 50 kW</b>	Retail Rate	Retail Rate
<b>Tier 2 - 50 kW up to 100 kW</b>	SS-1 Retail Rate	Retail Rate
<b>Tier 3 – over 100 kW up to 2 MW</b>	SS-1 Retail Rate	Fuel Rate

- The billed kWh consumption for each billing period will be the amount of kWh received from JEA measured at the meter at the end of the billing period. Customers will be charged using the customer’s Retail Rate for energy, demand, fuel, environmental and conservation charges per kWh for the metered kWh received from JEA during each billing cycle. The customer will always pay the monthly customer charge and the Retail Rate plus taxes and fees based on the kWh that customer receives from JEA even if there is net zero consumption or net excess kWh exported to the grid during the billing cycle. Monetary credits for each billing period will be based on the kWh sent to JEA measured at the meter at the end of the billing period and the rate applicable to the customer’s system. If the credit for a billing period is larger than the charges for the kWh received from JEA, JEA will carry over the credit balance, less any included taxes, to the next billing period. JEA will not distribute a monthly payment for the credit balance. JEA will apply the credit balance to the electric service balance each billing period through the end of the calendar year. If at the end of the calendar year the customer has a credit balance on the customer’s JEA account related to their net metering service, the credit balance will be applied to any outstanding balance on the combined JEA customer account. JEA will then pay the customer the remaining account credit balance. JEA will also apply any credit balance to the final bill at the time the service agreement, or

account, is closed and final billed. At the end of each year JEA will issue an IRS 1099-MISC tax form totalizing all monthly credits for the previous year to customers with total credits of \$600 or greater.

JEA reserves the right to monitor the aggregate load of all Net Metering connected to the JEA grid and at management’s sole discretion institute aggregate load limits in the future that will limit the net metering customers by total MWs connected, date or other aggregate characteristics. Currently, an aggregate JEA system load limit of 10 MW is in place for Tier 1 – 3 Net Metering. JEA also reserves the right to develop specific rate classifications in the future that may have different cost recovery based rate structures than implied through net metering practices under this JEA Net Metering Policy.

In order to qualify for a net metered interconnection to JEA’s distribution grid the customer’s generation system must have a gross power rating that:

1. Does not exceed 90% of the customer’s utility distribution service rating; and
2. Falls into one of the following ranges:
  - Tier 1 - 10 kW or less;
  - Tier 2 – greater than 10 kW and less than or equal to 100 kW;
  - Tier 3 – greater than 100 kW and less than or equal to 2 MW.
3. Does not result in annual energy (kWh) sent to the JEA grid that exceeds the customer’s annual energy (kWh) obtained from the JEA grid.

The customer will retain any Renewable Energy Certificates (REC) associated with a customer’s renewable generation. The customer will be required to install the system in accordance with JEA Rules and Regulations section 2.16 and Engineering & Construction Services Procedure ECS20202 902, as appropriate. The system must pass a JEA inspection prior to connection and operation. JEA will furnish, install, own and maintain metering equipment at the installation point capable of monitoring the flow of power from JEA to the customer and from the customer to JEA.

### Participation Estimates for the Program

Year	Total Number of Customers	Total Number of Eligible Customers	Annual Number of Program Participants	Cumulative Penetration Level (%) Calculated
2020	54,298	54,298	35	0.06%
2021	54,932	54,932	35	0.06%
2022	55,557	55,557	35	0.06%
2023	56,173	56,173	35	0.06%
2024	56,784	56,784	35	0.06%

## Savings Estimates

At the Meter						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	57,102	0.007	9.3	1,998,570	0.2	325.5
2021	57,102	0.007	9.3	1,998,570	0.2	325.5
2022	57,102	0.007	9.3	1,998,570	0.2	325.5
2023	57,102	0.007	9.3	1,998,570	0.2	325.5
2024	57,102	0.007	9.3	1,998,570	0.2	325.5

At the Generator						
Year	Per Customer kWh Reduction	Per Customer Winter kW Reduction	Per Customer Summer kW Reduction	Total Annual kWh Reduction	Total Annual Winter kW Reduction	Total Annual Summer kW Reduction
2020	59,272	0.007	9.7	2,074,516	0.3	337.9
2021	59,272	0.007	9.7	2,074,516	0.3	337.9
2022	59,272	0.007	9.7	2,074,516	0.3	337.9
2023	59,272	0.007	9.7	2,074,516	0.3	337.9
2024	59,272	0.007	9.7	2,074,516	0.3	337.9

## Impact Evaluation Plan

Because the metering set-up determines net effects it is difficult to determine exact contributions from customer installed systems. As a result, utilizing solar net metering participant pre-project and post-installation energy consumption data to conduct a statistical analysis to assess the program impacts may be the most cost effective evaluation method. Additional data such as weather data, building occupancy, operating hours, major equipment purchases or construction during the pre/post period would be used with this methodology. Site specific engineering estimates will be considered as an alternative method to statistical analysis if it is cost effective to develop them.