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Public Service Commission

April 6, 2020

Mr. Ansley Watson, Jr
Macfarlane Ferguson & McMullen
PO Box 1531
Tampa, FL 33601-1531
aw@macfar.com

**STAFF'S THIRD DATA REQUEST
VIA EMAIL**

Re: Docket No. 20190210-EG - 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 Company) provide responses to the following data request:

1. For each of the Company's existing Commission-approved demand-side management programs (Existing Programs), please identify the cost-effectiveness test results (Participants Test (PCT) and Gas Rate Impact Measure Test) using current financial assumptions, in Microsoft Excel format with formulas intact. For the PCT analysis, please do not include electric kilowatt-hour savings in the Load Reduction Scenario.
 - a. As part of this response, please provide a table comparing the results requested above with the cost-effectiveness test results for the Company's proposed modified programs in its petition (Proposed Programs). For the Proposed Programs, please do not include electric kilowatt-hour savings in the Load Reduction Scenario for the PCT analysis.
2. Please identify the total current and projected annual bill impact on the general body of customers' monthly bills *by program* based on usage of 20 Therms per month for each of PGS's Existing Programs for the years 2019 through 2028.
 - a. As part of this response, please provide a table comparing the results requested above with the total projected annual bill impact on the general body of ratepayers based on usage of 20 Therms per month for each of the Company's Proposed Programs for the years 2019 through 2028.

3. For each of PGS's Existing Programs, please identify the current and projected annual program savings that would contribute to the Commission-approved DSM goals for the years 2019 through 2028. Please identify retention and replacement program savings individually.
 - a. As part of this response, please provide a table comparing the results requested above with the projected annual program savings for each of the Company's Proposed Programs, identifying retrofit and replacement program savings individually, for the years 2019 through 2028.
4. Please identify the current and projected annual program participation for each of PGS's Existing Programs for the years 2019 through 2028. Please identify retention and replacement program participation individually.
 - a. As part of this response, please provide a table comparing the results requested above with the projected annual program participation for each of the Company's Proposed Programs, identifying retrofit and replacement program participation individually, for the years 2019 through 2028.
5. Please identify the total current and projected annual program costs for each of PGS's Existing Programs for the years 2019 through 2028. Please identify retention and replacement program costs individually.
 - a. As part of this response, please provide a table comparing the results requested above with the projected annual program costs for each of the Company's Proposed Programs, identifying retrofit and replacement program costs individually, for the years 2019 through 2028.
6. Please identify the total historical annual program costs for each of PGS's Existing Programs for the years 2010 through 2018. Please identify retention and replacement program costs individually.
7. Please identify the total historical annual program participation for each of PGS's Existing Programs for the years 2010 through 2018.
8. Please provide the total historical annual bill impact for each of PGS's Existing Programs for the years 2010 through 2018.
9. Please refer to page 11 of the Company's petition for approval of conservation cost recovery true-up and cost recovery factors proposed for use January 2020 through December 2020 filed on August 9, 2019, in Docket No. 20190004-GU. Please explain in detail how the Company plans to allocate the Common Costs among all of the programs the Company offers.

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Please file all responses electronically no later than **April 27, 2020**, via the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20190210-EG). If you have any questions, please contact me by phone at (850) 413-6592, or by email at tthomps@psc.state.fl.us.

Sincerely,

/s/ Takira Thompson

Takira Thompson
Engineering Specialist

TTT/jp

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