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May 5, 2020

**-VIA ELECTRONIC FILING-**

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

**RE: Docket No. 20200056-EG: Petition for Approval of Florida Power & Light Company's Demand-Side Management Plan**

Dear Mr. Teitzman:

Please find enclosed for electronic filing Florida Power & Light Company's amended responses to Staff's First Data Request (Nos. 2 and 3) and Second Data Request (Nos. 7 and 8).

If there are any questions regarding this filing, please contact me at (561) 304-5662.

Sincerely,

/s/ William P. Cox  
William P. Cox  
Fla. Bar No. 0093531

cc: Douglas Wright, Division of Engineering  
Charles Murphy, Esq., Office of General Counsel  
Stephanie U. Eaton, Spilman Thomas & Battle, PLLC  
Derrick Price Williamson, Spilman Thomas & Battle, PLLC  
Barry A. Naum, Spilman Thomas & Battle, PLLC

**QUESTION:**

Please refer to the tab titled “2015 vs. 2020 Program Comp” in the Excel Tables Spreadsheet.

- a. Please provide, in Microsoft Excel format, a similar table identifying the annual and total demand and energy savings (both per program and per program participant), participation, incentive and total program costs (both in nominal and 2020 CPVRR dollars), and annual bill impacts for a residential (1000 kWh per month) customer for each program (including audits) in your proposed 2020 DSM Plan, all residential programs combined, all business programs combined, and all programs combined for the period 2020 – 2024 based on projections from both your 2015 DSM Plan and 2020 DSM Plan filings. If any values cannot be provided, please explain why.
- b. Please also include in the table Rate Impact Measure (RIM), Total Resource Cost (TRC), and Participant (PCT) test results for each program (excluding audits) in your proposed 2020 DSM Plan, all residential programs combined, all business programs combined, and all programs combined for the period 2020 – 2024 based on projections from both your 2015 DSM Plan (if available) and 2020 DSM Plan filings. If any values cannot be provided, please explain why.

**RESPONSE:**

Please see Attachment No. 1 to this response. The attachment has been amended to reflect annual incremental bill impacts instead of the monthly bill impacts provided in the original response.

Attachment No. 1 is the Microsoft Excel Spreadsheet “20200056 - Staff's 1st DR No. 2 - Attachment No. 1 - Amended,” which has been provided to Commission Staff via email to Doug Wright at [dwright@psc.state.fl.us](mailto:dwright@psc.state.fl.us).

**QUESTION:**

Please adjust the incentive levels, and any program attributes that would change as a result (participation, administrative costs, etc.), of each program (excluding audits) in your proposed 2020 DSM Plan to raise their RIM test results to as close to 1.00 as possible.

- a. Please explain if this modified 2020 DSM Plan (2020 RIM DSM Plan) is capable of achieving the annual residential and business goals established by the Commission by Order No. PSC-2019-0509-FOF-EG.
- b. Please refer to the tab titled “2020 RIM DSM Plan” in the Excel Tables Spreadsheet. Please provide, in Microsoft Excel format, a similar table identifying the annual and total demand and energy savings (both per program and per program participant), participation, incentive and total program costs (both in nominal and 2020 CPVRR dollars), and annual bill impacts for a residential (1000 kWh per month) customer for each program (including audits) in the 2020 RIM DSM Plan, all residential programs combined, all business programs combined, and all programs combined for the period 2020 – 2024. If any values cannot be provided, please explain why.
- c. Please also include in the table Rate Impact Measure (RIM), Total Resource Cost (TRC), and Participant (PCT) test results for each program (excluding audits) in the 2020 RIM DSM Plan, all residential programs combined, all business programs combined, and all programs combined for the period 2020 – 2024. If any values cannot be provided, please explain why.

**RESPONSE:**

Please see Attachment No. 1 to this response. The attachment has been amended to reflect annual incremental bill impacts instead of the monthly bill impacts provided in the original response.

Attachment No. 1 is the Microsoft Excel Spreadsheet “20200056 - Staff's 1st DR No. 3 - Attachment No. 1 - Amended,” which has been provided to Commission Staff via email to Doug Wright at [dwright@psc.state.fl.us](mailto:dwright@psc.state.fl.us).

**QUESTION:**

Please refer to the tab titled "Existing Program Projections" in the attached Microsoft Excel document titled "FPL Data Request #2 – Excel Tables," (Excel Tables Spreadsheet).

- a. Please complete the table, and provide a copy in Microsoft Excel format, in a manner similar to FPL's Response to Staff's First Data Request, Question No. 2, but for FPL's DSM programs as they exist today (i.e., without the program modifications proposed in FPL's 2020 DSM Plan) using the same market assumptions (e.g. economics, participation) used to calculate the cost-effectiveness and annual demand and energy savings projections for FPL's proposed 2020 DSM Plan. If any values cannot be provided, please explain why.
  
- b. Please also include in the table Rate Impact Measure (RIM), Total Resource Cost (TRC), and Participant (PCT) test results for each program (excluding audits), all residential programs combined, all business programs combined, and all programs combined. If any values cannot be provided, please explain why.

**RESPONSE:**

Please see Attachment No. 1 to this response. The attachment has been amended to reflect annual incremental bill impacts instead of the monthly bill impacts provided in the original response.

Attachment No. 1 is the Microsoft Excel Spreadsheet "20200056 - Staff's 2nd DR No. 7 - Attachment No. 1 - Amended," which has been provided to Commission Staff via email to Doug Wright at [dwright@psc.state.fl.us](mailto:dwright@psc.state.fl.us).

**QUESTION:**

Please refer to FPL's Response to Staff's First Data Request, Question Nos. 2-3, FPL's Response to Staff's Second Data Request, Question No. 7, and the tab titled "ECCR Costs" in the Excel Tables Spreadsheet. Please complete the table, and provide a copy in Microsoft Excel format, by providing projections of the annual and period total ECCR costs and annual residential bill (1000 kWh/month) impacts per program for the period 2020-2024 for each of FPL's existing programs, those programs in FPL's 2020 DSM Plan, and those programs as modified in response to Staff's First Data Request, Question No. 3 (2020 RIM DSM Plan). For annual and period total ECCR costs and annual bill impacts, please report the portion of the total caused by servicing program participants from years prior to the reporting year (historical) and the portion caused by servicing program participants just in the reporting year (incremental), in addition to the total of these costs. An example is included in the Excel Tables Spreadsheet for clarity.

**RESPONSE:**

Please see Attachment No. 1 to this response. The attachment has been amended to reflect annual incremental bill impacts instead of the monthly bill impacts provided in the original response.

Attachment No. 1 is the Microsoft Excel Spreadsheet "20200056 - Staff's 2nd DR No. 8 - Attachment No. 1 - Amended," which has been provided to Commission Staff via email to Doug Wright at [dwright@psc.state.fl.us](mailto:dwright@psc.state.fl.us).