

COMMISSIONERS:  
GARY F. CLARK, CHAIRMAN  
ART GRAHAM  
JULIE I. BROWN  
DONALD J. POLMANN  
ANDREW GILES FAY

STATE OF FLORIDA



DIVISION OF ENGINEERING  
TOM BALLINGER  
DIRECTOR  
(850) 413-6910

# Public Service Commission

May 8, 2020

Mr. William P. Cox  
Florida Power & Light Company  
134 W. Jefferson Street  
Tallahassee, FL 32301  
[Will.Cox@fpl.com](mailto:Will.Cox@fpl.com)

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

**Re: Docket No. 20200056-EG - Petition for approval of demand-side management plan and request to modify residential and business on call tariff sheets, by Florida Power & Light Company.**

Dear Mr. Cox:

Please provide a response to the following questions by May 22, 2020.

1. Please refer to FPL's response to Staff's First Data Request, Question No. 8, in which FPL states that it would implement program caps if all three goals (Summer MW, Winter MW, and Annual GWh) are achieved for either the residential or business sectors prior to the end of a given year.
  - a. Please define the term "aggregate," as used in FPL's response to Part b.
  - b. For each year in the 2020-2024 projected period, what is the projected administrative cost to implement program caps?
  - c. Please describe the relationship between program caps and administrative costs for the programs that are eligible for caps.
  - d. Please describe the effect of program caps on the program managers and other administrative employees (i.e., how will FPL distribute the workload of an employee whose program has been capped?). Please detail how the payroll-related costs of reassigned employees would be reflected (reallocated) in FPL's ECCR schedules.
  - e. Aside from payroll-related costs, please describe how FPL would reallocate other administrative costs if a program is capped. Discuss in your response how reallocated administrative costs would be reflected in cost effectiveness evaluations in the 2020-2024 review period.
  - f. Once a program is capped in a given period, will administrative costs for the program and/or the sector cease, or continue for the balance of the period? Discuss in your response what other types of costs will either cease or continue for the balance of the period.
  - g. In its response to Question No. 8, FPL stated that if capping were needed, the expectation is that the need to do so would occur "very late" in the year. If that expectation were accurate, please discuss the rationale for implementing caps for what is likely to be a short period of time?

Mr. William P. Cox

Page 2

May 8, 2020

- h. Please identify the month in 2017 when all three goals were achieved for the residential sector.
  - i. By applicable year, please identify the months in 2017-2019 when all three goals were achieved for the commercial/industrial sector.
2. In its Petition, at page 3, the Company stated that only a small number of programs in FPL's 2020 DSM plan remain cost effective. Assuming that all three goals were achieved in a given year for the applicable sectors, please answer the following questions:
  - a. Is it correct that the Residential Load Management (On Call) program would not be subject to program caps on participation, and would continue to be offered? Discuss why or why not.
  - b. Is it correct that the Business On Call program would not be subject to program caps on participation, and would continue to be offered? Discuss why or why not.
  - c. Is it correct that the C/I Demand Reduction program would not be subject to program caps on participation, and would continue to be offered? Discuss why or why not.
  - d. Is FPL proposing to cap both cost-effective and non-cost-effective programs for a sector once it meets all three goals for that sector in a given year? Discuss why or why not.

Please contact me by phone at (850) 413-6682 or by email at [dwright@psc.state.fl.us](mailto:dwright@psc.state.fl.us) if you have any questions.

Sincerely,



Douglas Wright  
Engineering Specialist

DW:jp

Attachment

cc: Office of Commission Clerk (Docket No. 20200056-EG)