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# Public Service Commission

May 28, 2020

Mr. Andrew M. Brown  
Macfarlane Ferguson & McMullen  
PO Box 1531  
Tampa, FL 33601-1531  
[ab@macfar.com](mailto:ab@macfar.com)

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

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

Dear Mr. Brown:

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

1. Please refer to PGS's response to staff's third data request, number 1. Please explain why the Utility's existing Residential-Replacement program is failing the Gas Rate Impact Measure (G-RIM) test. As part of this response, please identify and describe a possible solution to achieve a passing G-RIM test result, while maintaining a passing Participants Test (PCT) result. If this is not possible, please explain why.
  - a. Please identify and describe possible solutions to achieve passing G-RIM test results for the Utility's proposed Residential-Replacement Tank Water Heater and Tankless Water Heater programs while maintain passing PCT results. If this is not possible, please explain why.
  - b. Please explain the reason for all differences in the G-RIM Test and PCT results for like programs when comparing the Utility's Existing Programs and Proposed Programs.
2. Please refer to PGS's response to staff's third data request, number 3. Please explain why the total projected residential annual therm savings are different for the Utility's Existing Programs as compared to its Proposed Programs.
3. Please refer to PGS's response to staff's third data request, number 4. Please explain the reason for all differences in projected annual program participation for like programs when comparing the Utility's Existing Programs and Proposed Programs.

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4. Please refer to PGS's response to staff's third data request, number 5. Please detail why the total projected program cost of the Utility's existing Electric Replacement program is different from the Utility's proposed Commercial Retrofit program.
5. Please explain in detail why PGS believes that electric kilowatt-hour savings should be included as part of the energy charge savings in the Load Reduction Scenario.

Please file all responses electronically no later than **June 5, 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-EG). 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,

*/s/ Takira Thompson*

Takira Thompson  
Engineering Specialist

TTT/jp

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