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July 2, 2020

-VIA ELECTRONIC FILING-

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

RE: Docket No. 20200055-EG: Petition for approval of demand-side management plan by Gulf Power Company.

Dear Mr. Teitzman:

Gulf Power Company (“Gulf” or the “Company”) submits these comments regarding Commission Staff’s recommendation on the Company’s Petition for approval of its demand-side management (“DSM”) plan.

In lieu of adopting Gulf’s proposed DSM Plan, Commission Staff has recommended that the Commission continue the Company’s existing DSM Plan which was approved by the Commission in 2015.

While Staff is correct in its observation that Gulf’s existing DSM Plan was originally designed to meet the Company’s DSM Goals, Gulf has, as a practical matter, experienced challenges with respect to goal attainment over the past five years. Gulf believes that these challenges are due, at least in part, to decreased customer interest in programs offered under the existing Plan. Gulf’s proposed DSM Plan involves many new programs and was developed with an eye toward increasing customer engagement and maximizing the potential for Goal achievement.

Moreover, as discussed at page 9 of Staff’s Recommendation, the monthly ECCR factor for a 1,000 kWh residential bill is actually projected to decrease from \$1.40 in 2018 to \$1.09 in 2021 under Gulf’s proposed DSM Plan as compared to maintaining the status quo. Accordingly, Gulf respectfully requests that the Commission approve the Company’s proposed DSM Plan.

Gulf Power appreciates the opportunity to submit these written comments and will be available to discuss the same at the July 7, 2020 Commission Conference.

Sincerely,

/s/ Steven R. Griffin
Steven R. Griffin
Fla. Bar No. 627569

cc: Charles Murphy, Senior Attorney
Stephanie Eaton, Counsel to Walmart, Inc.
Bradley Marshall, Counsel to LULAC and SACE