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Via Electronic Filing Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Gulf Power Company's Responses to Staff's First Data Request (Docket No. 20200000-OT)

Dear Mr. Teitzman:

Enclosed are Gulf Power Company's responses to Staff's First Data Request (Nos. 1-7) in Docket No. 20200000-OT. This is concerning Gulf Power Company's 2021 Load Research Sampling Plan Filing (September 30, 2020).

If you have any questions or require additional information about this filing, please call Tara Dubose at (561) 691-2391.

Sincerely,

/s/ Tara B. DuBose
Tara B. DuBose
Manager, Cost and Load Research

CC: Bill McNulty, Chief of Conservation and Forecasting (via electronic mail)
Michael Barrett, Economic Supervisor (via electronic mail)
Zachary Rogers, Public Utility Analyst (via electronic mail)
Office of Commission Clerk

QUESTION:

How did smart meter advancements affect load research techniques for estimating average coincident peak and class load factors for Gulf's 2021 Load Research Sampling Plan?

RESPONSE:

Smart meter advancements affected the data gathering process and load research meter management but did not affect load research techniques for estimating average coincident peak and class load factors for Gulf's 2021 Load Research Sampling Plan.

QUESTION:

How will smart meter advancements affect load research techniques for estimating average coincident peak and class load factors for future Load Research Sampling Plans?

RESPONSE:

Smart meter advancements will have no effect on load research techniques for estimating average coincident peak and class load factors for future Load Research Sampling Plans.

QUESTION:

In Docket No. EC20-60, the Federal Energy Regulatory Commission (FERC) recently approved the merger between Gulf and NextEra Energy, Inc. Please identify what impact, if any, that action will have on the 2021 Plan, which seeks approval of sample deployments for the years 2020 to 2022.

RESPONSE:

The legal merger between Gulf and NextEra Energy, Inc. approved by FERC in Docket No. EC20-60 does not impact the 2021 Gulf Sampling Plan. Gulf expects the legal merger to occur on or about January 1, 2021. However, Gulf will continue as a separate ratemaking and jurisdictional entity with its own base rates approved by the Florida Public Service Commission in Order No. PSC-2017-0178-S-EI and will continue to maintain separate books and records for all regulatory and ratemaking purposes until otherwise authorized by the Commission.

Gulf and its affiliate, Florida Power & Light Company (“FPL”), currently intend to file a combined rate case in 2021 that would, if approved as filed, result in unified rates effective January 1, 2022. However, the combined rate case filing would have no impact on Gulf’s pending 2021 Sampling Plan.

QUESTION:

Is it possible that Gulf could (or will) perform load research sampling activities remotely? If so, please state when Gulf would have that capability.

RESPONSE:

Sampling activities such as selecting and deselecting customers, as well as sample deployments, retirements and replacements throughout the year, are performed remotely by Gulf with a few exceptions. When a premise is selected for load research, the premise is provided to Gulf's Field Customer Service department to remotely convert the meter for load research. Depending on a customer's meter type, a small number may be manually converted, but the majority will be converted remotely. The meter conversion will initiate a process that gathers the customer's data to be imported into the load research system for analysis.

QUESTION:

For ease of reference, please review the following table for the purposes of addressing this Data Request:

Rate Class	Sample Points in the 2021 Plan	Sample Points in the 2018 Plan
GS	345	256
GSD	190	430
RS/RSVP	561	450

- a. Comparing the 2021 and the 2018 Plans, please explain why the sample points for the 2021 RS/RSVP rate class increased to 561 from 450?
- b. Comparing the 2021 and the 2018 Plans, please explain why the sample points for the 2021 GSD rate class decreased to 190 from 430?
- c. Comparing the 2021 and the 2018 Plans, please explain why the sample points for the 2021 GS rate class increased to 345 from 256?

RESPONSE:

Gulf's 2021 Sampling Plan more closely resembles the methodologies used for FPL Sampling Plans. A one-dimensional stratified random design was used based on the annual average monthly energy for the GS, GSD and RS/RSVP rate classes. The sample sizes reported in the Gulf 2021 Sample Plan were designed to meet Florida Public Service Commission accuracy requirements based on the requisite confidence level and expected data loss factors. Specific sample design differences are explained below.

- a. The difference between sample points for the RS/RSVP rate class from 2018 to 2021 can be explained by the following.
 1. In Gulf's 2018 Sampling Plan, the RS and RSVP rate schedules were analyzed separately and later combined for Cost of Service purposes. For 2021, RS and RSVP are combined into one rate class to more closely align load research with cost of service studies.
 2. The 2018 methodology used two dimensional sampling that included a multi-family stratum, a mobile home stratum, and three single-family detached strata breaking at 0-1150 kWh, 1151-1950 kWh, and over 1951 kWh. The 2021 sampling plan does not treat multi-family and mobile-homes as separate strata.

3. 2018 Sampling Points were based on winter peak month. The 2021 Sampling Plan is based on the month that yielded the highest number of sample points.
- b. The difference between sample points for the GSD rate class from 2018 to 2021 can be explained by the following.
1. The 2018 Gulf Sampling Plan for the GSD rate class includes 225 sample points and 160 census meters for the GSD rate schedule plus 45 meters for the GSTOU rate schedule. The 2021 Sampling Plan does not include census meters or GSTOU meters as separate strata.
 2. 2018 Sampling Points were based on winter peak month energy while the 2021 Sampling Plan is based on the month that yielded the highest number of sample points.
- c. The difference between sample points for the GS rate class from 2018 to 2021 can be explained by the following.
1. In Gulf's 2018 Sampling Plan, the GS rate class was stratified based on winter peak month energy with a census stratum for the highest energy users. For Gulf's 2021 Sampling Plan, the GS rate class was stratified based on the month that yielded the highest number of sample points. There is no census stratum for higher energy users.

QUESTION:

Comparing the 2021 and the 2018 Plans, Staff observed that the strata breakpoints were increased for the GS and GSD rate classes. Please explain.

RESPONSE:

Please see Gulf's response to Staff's First Data Request No. 5 concerning GS and GSD rate class sample design differences between the Gulf 2018 Sample Plan and the Gulf 2021 Sample Plan.

QUESTION:

Please review Table 1, as shown on Page 5 of the 2021 Plan, and the comparative information from a similar table in the Company's 2018 Plan. For ease of reference, the following three tables present information that came from both sources.

Plan	Retail Sales Rate Class	Annual Retail Billed Sales	
		MWH	Percent
2021	RS & RSVP	384,277	49.13%
2018	RS & RSVP	5,318,044	48.05%

Plan	Rate Class	MWH	Percent
2021	GSD, GSDT, & GSTOU	175,850	22.48%
2018	GSD, GSDT, & GSTOU	2,575,348	23.27%

Plan	Rate Class	MWH	Percent
2021	LP & LPT	61,553	7.87%
2018	LP & LPT	852,357	7.71%

- a. In Gulf's 2018 Plan, the total amount of annual retail billed sales for the RS & RSVP rate classes for 2016 was 5,318,044 MWH, while in the 2021 Plan, the comparative total for the same rates classes is 384,277 MWH for annual retail billed sales in 2019. Please explain the reason for such a large variance in the MWH sales amounts.

- b. In Gulf's 2018 Plan, the total amount of annual retail billed sales for the GSD, GSDT, and GSDTOU rate classes for 2016 was 2,575,348 MWH, while in the 2021 Plan, the comparative total for the same rate classes is 175,850 MWH for Annual Retail Billed Sales in 2019. Please explain the reason for such a large variance in the MWH sales amounts.

- c. In Gulf's 2018 Plan, the total amount of annual retail billed sales for the LP and LPT rate classes for 2016 was 852,357 MWH, while in the 2021 Plan, the comparative total for the same rate classes is 61,553 MWH for Annual Retail Billed Sales in 2019. Please explain the reason for such a large variance in the MWH sales amounts.

- d. In Gulf's 2018 Plan, the total amount of annual retail billed sales for 2016 was 11,067,383 MWH, while in the 2021 Plan, the total amount of retail sales is 782,227 MWH for 2019. Please explain the reason for such a large variance in the MWH sales amounts.

- e. Please identify the number of rate classes that are grouped into the All Other Rate Classes category for the 2021 Plan. For comparative purposes, please identify the number of rate classes that were grouped into this rate class under the 2018 Plan.

RESPONSE:

a-d. The annual billed sales differences described above are the result of a clerical error in the filing. December 2019 sales were used for the table instead of annual 2019 sales. A revised Table 1 for the 2021 Plan is attached to this response. The purpose of the table is to determine the rate classes that must be included in the plan based on each class' percentage of total retail sales. Because this percentage does not vary significantly on a monthly versus yearly basis, the error did not impact the results. Table 1 is not used to prepare other portions of the Sample Plan so there are no other impacts. Revised comparisons are provided in the table below:

Plan	Retail Sales Rate Class	Annual Retail Billed Sales	
		MWH	Percent
2021	RS & RSVP	5,528,121	49.71%
2018	RS & RSVP	5,318,044	48.05%

Plan	Rate Class	MWH	Percent
2021	GSD, GSDT, & GSTOU	2,501,334	22.49%
2018	GSD, GSDT, & GSTOU	2,575,348	23.27%

Plan	Rate Class	MWH	Percent
2021	LP & LPT	826,618	7.43%
2018	LP & LPT	852,357	7.71%

As shown in the table above, the differences between the annual retail billed sale for 2018 and 2019 are minimal.

- e. The "All Other Rate Classes" category contains rate classes SBS, OS I/II and OS III, which represent 0.13%, 0.91% and 0.42% of Annual Retail Billed Sales (kWh), respectively. These classes were also not grouped together in the 2018 Plan, as they did not represent more than 1% of Annual Sales.

TABLE 1

GPC Retail Sales Rate Class	2019 Annual Retail Billed Sales		Data Collection Process
	MWH	Percent	
RS/RSVP Residential Service: RS and RSVP	5,528,121	49.71%	Sampling Plan
GSD General Service Demand: GSD, GSDT and GSTOU	2,501,334	22.49%	Sampling Plan
Major Accounts: RTP, CSA and PXT	1,773,515	15.95%	100% Studied
LP Large Power: LP and LPT	826,618	7.43%	100% Studied
GS General Service Non-Demand: GS-1	328,640	2.96%	Sampling Plan
All Other Rate Classes ¹	161,874	1.46%	N/A
Total	11,120,102	100%	

1. Each rate class in this category falls below the 1% of annual retail sales criterion. These rate classes include SBS, OS I/ II and OS III. Thus, load research sampling plans are not required.