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February 15, 2021

VIA ELECTRONIC FILING

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

Re: *Proposed Amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities;*
Docket No. 20200181

Dear Mr. Teitzman:

On behalf of Duke Energy Florida, LLC ("DEF"), please find enclosed for electronic filing in the above-referenced Docket, DEF's Post Workshop Comments.

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Sincerely,

/s/ Matthew R. Bernier

Matthew R. Bernier

MRB/cmw
Enclosure

cc: Margo DuVal

**IN RE: PROPOSED AMENDMENT OF RULE 25-17.0021, F.A.C., GOALS FOR
ELECTRIC UTILITIES**

Duke Energy Florida, LLC Post Workshop Comments

On December 15, 2020, the Florida Public Service Commission (“FPSC”) published proposed changes to Rule 25-17.0021 F.A.C., Goals for Electric Utilities, and subsequently on January 14, 2021, FPSC Staff (“Staff”) hosted a Rulemaking Workshop to add clarity and specificity to the rule language. Representatives of Duke Energy Florida, LLC (“DEF”) and other FEECA¹ utilities, along with interested stakeholders, participated in the workshop and provided both general and specific comments on Staff’s proposed language. At the conclusion of the workshop, Staff invited interested parties to provide subsequent, written comments. In response to the invitation, DEF offers the following post workshop comments for Commission consideration:

Based on review of the proposed rule changes and clarity gleaned from the January 14th Rulemaking Workshop, DEF supports the rule changes as proposed by Staff for the following reasons:

- DEF understands that the effect of these changes will streamline the current two-step, goal-setting program approval process into a single step by permitting the FEECA utilities to develop and file program-level offerings intended to meet each of the company’s proposed DSM goals concurrent with its goals filing. DEF agrees that inclusion of more specific detail regarding how the proposed savings will be achieved will facilitate a more transparent and streamlined goals approval process,

¹ Florida Energy Efficiency and Conservation Act, § 366.80-.82, Fla. Stat.

in line with the desire expressed by several Commissioners during the last goal-setting proceeding. The program-level information will provide greater insight into how the proposed savings will affect existing programs as well as how they may support new program offerings.

- DEF believes the program-level information may also provide greater clarity regarding the cost and benefits of the proposed savings to specific types and classes of customers. For example, program-level information may be particularly useful in understanding the impacts to low-income customers.
- DEF also expects the proposed changes will allow greater transparency into the relationship of the proposed savings to energy-efficiency technologies and opportunities available in the marketplace.

DEF appreciates the opportunity to provide these comments and respectfully reserves the right to provide additional comments pending its review of comments from other parties. DEF supports Staff's ongoing consideration of comments and concerns from interested stakeholders and would also support additional workshop sessions to discuss any such comments or concerns that warrant further conversation.