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February 15, 2021

BY E-PORTAL

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

Re: *Docket No. 20200181-EU* - In re: Proposed amendment of Rule 25-17.0021, F.A.C.,
Goals for Electric Utilities.

Dear Mr. Teitzman:

Attached for filing, please find Florida Public Utilities Company's Post Workshop Comments in the above referenced matter.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,

s/Beth Keating
Beth Keating
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MEK

cc: Margo Duval (Office of General Counsel)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed amendment of Rule 25-) Docket No. 20200181-EU
17.0021, F.A.C., Goals for Electric Utilities.)

) Filed: February 15, 2021

POST WORKSHOP COMMENTS OF FLORIDA PUBLIC UTILITIES COMPANY

Florida Public Utilities Company (“FPUC”) hereby offers the following comments regarding the Florida Public Service Commission Staff’s proposed changes to Rule 25-17.0021, Florida Administrative Code (the “Rule”). At the outset, FPUC commends Staff’s efforts to update the Rule, as well as the helpful discussion had at the January 14, 2021, rule workshop. FPUC believes that the amendments to the Rule, as proposed by Staff, are reasonable, productive revisions that provide a greater level of clarity as it relates to both the procedure and the analysis to be undertaken in the conservation goals setting process.

The proposed change as it relates to including the filing of proposed programs with a utility’s proposed goals and its technical potential study is a change that FPUC believes will not only streamline the process, but provide the Commission with additional data points that should be beneficial to the overall goal setting process. Likewise, requiring that the utilities describe how the technical potential study was used to develop the utility’s proposed goals and programs, including the identification of measures that were excluded from program consideration, will allow for greater clarity regarding the correlation between the cost-effectiveness tests, program development, and overall cost considerations for the utilities’ general body of ratepayers.¹ Here, however, FPUC would suggest a minor change to subsection (2) to better define the scope of the utilities’ responsibility to identify measures that were excluded:

¹ Proposed Rule 25-17.0021(2).

(2) Pursuant to an order establishing procedure in the proceeding to establish goals, each utility must file a technical potential study, proposed demand-side management goals, plans, and programs for Commission approval. Each utility's filing must describe how the technical potential study was used to develop the utility's proposed goals and programs, including the identification of measures that were analyzed, but excluded from program consideration.

With regard to the other changes reflected in the proposed rule, the changes lend an additional level of clarity, while maintaining consistency with the underlying statutory provisions, as appropriate. Overall, the changes proposed will result in a clearer Rule and a streamlined process that will, FPUC expects, not only enhance the data points available for the purpose of setting goals, but also improve the utility's ability to develop programs that meet those goals. As such, FPUC fully supports the Commission Staff's proposed changes.

Respectfully submitted this 15th day of February, 2021,

By: *s/Beth Keating*

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