



Dianne M. Triplett  
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June 28, 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”) and Joint Stakeholders, please find enclosed, for electronic filing in the above-referenced Docket, Post-Workshop Comments from DEF and Joint Stakeholders following the second, Staff-led Workshop held on May 18, 2021.

Thank you for your assistance in this matter. Please feel free to call me at (727) 820 - 4692 should you have any questions concerning this filing.

Respectfully,

*/s/ Dianne M. Triplett*

Dianne M. Triplett

DMT/cmw  
Enclosure

cc: Margo DuVal  
Joint Stakeholders

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Proposed Amendment of Rule 25-17.0021, F.A.C.,  
Goals for Electric Utilities

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Docket No. 20200181-EI

Filed: June 28, 2021

**POST-WORKSHOP COMMENTS FROM JOINT STAKEHOLDERS**

Duke Energy Florida, LLC (“DEF”), Ameresco, Inc., A.O. Smith, Building Performance Association (“BPA”), Carrier Corporation, Ceres, Consumer Federation of America (“CFA”), Cree Lighting, EMS Energy, Franklin Energy, Johnson Controls, Lutron Electronics, National Association of Energy Service Companies (“NAESCO”), Oracle Corporation, Polyisocyanurate Insulation Manufacturers Association (“PIMA”), Proctor Engineering, Schneider Electric, Sealed, Siemens, Southeast Energy Efficiency Alliance (“SEEA”), Southeast Sustainability Directors Network (“SSDN”), Trane Technologies, Uplight and Vote Solar (collectively the “Joint Stakeholders”) recognize the value of demand-side management (“DSM”) to save energy, reduce demand, create local jobs, reduce electricity costs for businesses and customers, strengthen Florida’s economy, ensure cleaner air to breathe and cleaner water to drink and build healthier, more resilient communities. After the Florida Public Service Commission (“Commission”) Staff convened its second workshop on May 18, 2021, to solicit interested stakeholder input on potential further rule revisions for the Commission’s consideration, the Joint Stakeholders had multiple conversations to find common ground and agreement.

First and foremost, the Joint Stakeholders appreciate the Commission’s interest and Commission Staff’s efforts to update and improve the Florida Energy Efficiency and Conservation Act (“FEECA”) rules, as well as this opportunity to provide input. As a result of the fruitful discussion regarding additional potential improvements, the Joint Stakeholders have found common ground and agree that, in the Order Establishing Procedure (OEP) in the next DSM Goal Setting proceeding or any future rulemaking

pertaining to FEECA rules, Joint Stakeholders will collaborate to help ensure the following enhancements are part of the FEECA process:

- The ability for interested stakeholders to provide input in the DSM Goal Setting process and the development of associated DSM Program Plans.
- DSM Goals and proposed DSM Program Plans are meaningful, reasonable and do not over or under emphasize cost-effectiveness from any single perspective, as well as broadening the consideration of cost-effectiveness and underlying assumptions to include the perspective of DSM as a utility system investment through the lens of the Utility Cost Test.
- The process used to determine DSM Goals appropriately reflects the economic circumstances of different customers in the determination of free ridership and cost-effectiveness allowing utilities to offer meaningful and adequately funded energy-efficiency and demand-response offerings to assist low-income customers.
- The DSM Goals and DSM Program Plans appropriately reflect the energy and capacity savings that can be achieved through utility educating, enabling and empowering energy-saving customer behavior.
- The Commission considers potential modifications to the regulatory constructs permitted under FEECA, as well as the necessary associated reporting, to better align utility and customers' interests around the provision of meaningful, energy-efficiency programs.

The Joint Stakeholders appreciate the opportunity to provide these comments and respectfully reserve the right to provide additional comments pending their review of comments from other parties.

[Joint Stakeholders' signatures to follow on pages 3-8]

**Duke Energy Florida, LLC (DEF)**

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