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October 7, 2021

-VIA ELECTRONIC FILING-

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

**RE: Docket No. 20210132
Petition of FPL for Approval to Integrate Demand-Side Management Plans and
Approval of Regulatory Asset**

Dear Mr. Teitzman:

Please find attached FPL's Response to Staff's First Data Request (Nos. 1-6) in the above referenced docket.

If there are any questions, please contact me at (561) 304-5662.

Sincerely,

/s/ William P. Cox

William P. Cox
Senior Attorney
Fla. Bar No. 00093531

Enclosures

cc: Orlando Wooten, Division of Engineering
Walter Trierweiler, Office of the General Counsel

Florida Power & Light Company
Docket No. 20210132-EG
Staff's First Data Request
Request No. 1
Page 1 of 1

QUESTION:

In part, the petition at Paragraph 13 of the Company's petition states "FPL recently launched new industry-leading versions of both residential and business surveys which leverage customers' hourly meter data and specialized algorithms to provided enhance individually tailored savings suggestions."

- a. Please identify the specific DSM Program(s) these surveys are offered under.
- b. Are these survey tools available to all customers in all FPL service areas? If not, provide a detailed response identifying any portion of FPL's service territory where these tools are not yet available. If applicable, please state when these survey tools will be available to all customers.

RESPONSE:

- a. The residential survey is offered as part of the Residential Home Energy program, and the business survey is offered as part of the Business Energy Evaluation program.
- b. These tools are currently available to customers in FPL's legacy service area. Customers in Gulf's previous service area currently utilize similar online energy survey tools and will be migrated to FPL's versions of both residential and business surveys by the end of 2022. The survey tools are offered to customers in all three channels: field, phone, and online.

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Staff's First Data Request
Request No. 2
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QUESTION:

Please refer to Paragraph 16 of the Company's petition.

- a. In part, the petition at Paragraph 16 of the Company's petition states "The Integrated DSM Plan brings new programs to customers in the Gulf area." Describe the marketing efforts and specifically-targeted initiatives that were developed to promote these programs to the customers in the Gulf area.
- b. Explain how FPL will inform customers of modified Programs.
- c. Has FPL engaged in discussions with the vendor-partners in the Gulf service territory that offered the Energy Select program about continuing the relationship with FPL in order to offer programs under the proposed integrated DSM Plan? If so, please summarize the discussion. If not, please explain why not?
- d. Describe what actions FPL has taken to maintain or expand the number of vendors participating in offering DSM programs under the proposed integrated DSM Plan in FPL's legacy service territory.
- e. Describe what actions FPL has taken to maintain or expand the number of vendors participating in offering DSM programs under the proposed integrated DSM Plan in Gulf's former service territory.

RESPONSE:

- a. FPL is preparing for the introduction of new DSM programs in Gulf's area by working through communication plans and updating program marketing materials. These communication plans and all marketing materials will be finalized upon approval of the combined program filing.

The Company's communication plans typically consist of traditional marketing channels such as brochure updates, program-specific web page content, eNewsletters, emails, bill messages and Participating Independent Contractor ("PIC") outreach efforts. Customers in Gulf's area will be incorporated into all regular program communications and marketing campaigns.

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Planned efforts across several media channels are currently underway to communicate with customers in Gulf's area about the integrated DSM program benefits. Our communication plans typically run seasonally based on program nuances and key business and/or consumer drivers. Insights specific to Gulf's area will be incorporated into the strategic thought process to ensure that we bring a high value of energy- and cost-saving solutions to those customers at the most relevant point in time.

- b. With the integration of the Residential Air Conditioning program, Residential Ceiling Insulation, and Residential Low Income program already being well-aligned, FPL will focus its marketing efforts and targeted initiatives to reach and inform customers and PICs on program availability, qualifications, and both energy- and cost-saving benefits.

FPL's Residential Buildsmart®, Commercial Demand Response ("CDR") and Business Lighting programs will be expanded to customers in Gulf's area, while the Business HVAC program will offer the Thermal Energy Storage ("TES") measure to former Gulf customers. Current efforts to support these programs in Gulf's area include updating all marketing materials and web page content.

FPL has been implementing a phased approach to inform customers about changes to Company programs. Various channels being leveraged for these important communications include FPL.com global banner, GulfPower.com homepage tiles, bill messages, letters, eNewsletters, social media, media outreach, news releases, and email communications.

- c. The Company has been in regular communications with the Energy Select program vendor, Itron, regarding proposed sunseting of the program in the Integrated DSM plan. These communications have included detailed discussions about utilizing Itron's demand response platform for management of the CILC and CDR programs.
- d. FPL regularly reviews the performance of PICs and works with them to resolve any ongoing issues and on strategies to increase participation. Additionally, FPL is conducting one-on-one outreach to previously participating contractors who are not currently participating in the programs to inform them of upcoming program changes and re-enroll them as PICs for Residential HVAC, Buildsmart and Residential Ceiling Insulation programs in FPL's legacy service territory. FPL is also reaching out to new contractors and those who have never enrolled as PICs to recruit them for delivery of FPL programs.

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- e. When the Residential HVAC, Ceiling Insulation, and High Efficiency Pool Pump Programs were launched in Gulf's 2020 DSM Plan, the company began recruitment of PICs by mailing a letter to every licensed HVAC, insulation, and pool contractor in Gulf's service area describing the new programs and encouraging them to participate as a contractor. The Company followed up with a personal phone call to each contractor to discuss and explain the new program, answer any concerns, and encourage them to register as a PIC. The Company website was also changed to announce the new programs to create interest among our customers and drive them to request contractors to register in the program.

Since the Integrated DSM Plan continues the utilization of PICs, FPL is continuing recruitment of these contractors in Gulf's former service territory with updated details on the programs and standards.

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QUESTION:

In part, the petition at Paragraph 20 of the Company's petition states "recent rate analysis indicates 24% of customers enrolled in the [Energy Select] program would save by switching to Gulf's standard residential rate assuming their energy usage remains the same." Please answer the following:

- a. Were the results of this analysis shared with the customers enrolled in the [Energy Select] program that could save by switching? Why or why not?
- b. Please describe to efforts FPL is undertaking, or plans to undertake once approvals are granted, to migrate Energy Select customers to the Residential On Call program, or other program(s) to meet their needs.

RESPONSE:

- a. The results of the analysis referenced in the DSM Plan petition have not been shared with customers. This comparison of billed charges demonstrates that a portion of customers do not benefit from the RSVP rate compared to Gulf's standard RS rate. Independent of the rate analysis, this comparison does not reflect other benefits Energy Select customers may realize including usage savings through the use of the programmable thermostat and large appliance timers or remote access to these devices. This analysis only demonstrates that many customers are not shifting usage from the higher priced periods and, therefore, are not contributing to the load-leveling benefit of the time-of-use rate structure. It is not intended to support a conclusion that these customers are not realizing some benefit from the program.
- b. FPL has developed a comprehensive communication plan for Energy Select customers to be deployed once approvals are granted. This communication plan includes educational information about the transition to FPL's standard rate, RS-1, and how customers can continue to save energy using the programmable thermostat after the Energy Select program ends. The communication plan will also include information about other available energy efficiency programs and other account services, like budget billing, that can help these customers save energy and manage their utility bills. The Energy Select customers will not be migrated to FPL's On Call program since the infrastructure necessary to operate On Call does not exist in Gulf's area in Northwest Florida.

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QUESTION:

In part, the petition at Paragraph 22 of the Company's petition states that the capital assets of Gulf's legacy Energy Select program would be retired on December 31, 2021. Please answer the following:

- a. Please provide an explanation of how FPL calculated the \$22 million dollar value and provide a breakdown of these costs for each type of equipment mentioned in Paragraph 22 and all other costs.
- b. Please provide a breakdown of the \$22 million dollar capital asset balance, by account type, including both investment and net salvage value.
- c. What portion of the asset balance is installed equipment? Discuss whether this installed equipment will remain where it is, or will be removed.
- d. What portion of the asset balance is equipment that is new and never installed (i.e., warehoused items)? Discuss whether any portion of the warehoused items could be used by FPL to support another DSM program, or used by FPL in research and development.
- e. Discuss whether any portion of the new and never installed items could be sold to another electric utility.
- f. FPL is proposing to amortize the capital assets of Gulf's legacy Energy Select program over a 12-year period through the creation of a regulatory asset and recovered through the Energy Conservation Cost Recovery clause. Explain how the 12-year period was selected. Address in your response if a recovery period shorter than the remaining 12 year life was considered, in order to better match costs with benefits in time.

RESPONSE:

- a. The projected amount to be recovered via a regulatory asset in the Energy Conservation Cost Recovery ("ECCR") clause related to the termination of the Energy Select Program is \$22.7 million. This amount represents the sum of \$22.3 million of projected net plant-in-service in plant account 370 – Meters and Meter Accessories and inventory in FERC account 154 –Plant Materials and Operating Supplies of \$0.4 million as of December 31, 2021. These amounts are reflected on page 6 of Exhibit JNF-4 filed in Gulf Power's 2021 Actual/Estimated filing on August 6, 2021. We note that the actual amount to be recorded in the regulatory asset will be based on the amounts reflected on Gulf Power's books and records as of December 31, 2021. In addition, Gulf Power does not anticipate any salvage value for inventory or plant-in-service assets when the Energy Select program is terminated.

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The unrecovered balance of the Energy Select assets reflected in plant account 370 includes investment made for programmable communicating thermostats, load control relays (water heater and pool pump), in home communications equipment, and licensing. The bulk of this Mass Property investment is minor equipment and not categorized as a retirement unit until associated with a meter when it is capitalized as meter accessories. The minor items are never tied directly to the program except for the Meter accessory retirement unit. Gulf cannot provide the detail at the level being requested because of this retirement unit issue.

- b. See response to subpart (a) above.
- c. The portion of the asset balance that is related to installed equipment is \$18.5 million in Plant-in-Service/Depreciable Base, reflected on page 6 of Exhibit JNF-4 filed in Gulf Power's 2021 Actual/Estimated filing on August 6, 2021. The installed equipment will remain in place after closure of the program.
- d. The portion of the asset balance that is related to new and never installed equipment is \$0.4 million in Inventory, reflected on page 6 of Exhibit JNF-4 filed in Gulf Power's 2021 Actual/Estimated filing on August 6, 2021. The equipment is not applicable for use in support of any other FPL DSM programs or projects in consideration for FPL research and development.
- e. FPL did inquire with the only other utility with a similar program about their interest in purchasing Energy Select assets upon closure of the program. There was no interest expressed in purchasing the equipment.
- f. The proposed 12-year amortization period was selected as it approximates the current authorized depreciation rate of 7.9% for Energy Select investments. No other amortization period was considered in determining FPL's proposal.

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Staff's First Data Request
Request No. 5
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QUESTION:

Pending approvals, Attachment C reflects that Gulf's Residential High Efficiency Pool Pump and the Energy Select programs are scheduled to be discontinued.

- a. Please describe the communications the Company has had with existing vendors and/or customers regarding this matter, in advance of approvals being granted.
- b. Please describe the follow-up communications the Company has planned, if, or when approvals are granted.

RESPONSE:

- a. The Company has been engaged in numerous communications with the Energy Select vendor, Itron, regarding proposed discontinuation of the program at the end of 2021. These discussions have addressed current contract provisions and potential future support beyond program closure. In May 2021, the Company notified all customers of the proposed rate alignment and migration as proposed in the rate case (Docket No. 20210015-EI), including elimination of the RSVP tariff which is a component of the Energy Select program. Although the Company continues to provide information about the program on the website and accept new enrollments, in September 2021, the Company began providing messaging to customers who began the enrollment process that, if approved by the Florida Public Service Commission, the program would be eliminated at the end of 2021.

For the pool pump program, the Company has verbally communicated with active Participating Independent Contractors ("PICs") about the proposed termination of the program at the end of 2021.

- b. Pending approval of FPL's petition in this docket, the Company has planned to initiate communications with all Energy Select customers in early November 2021 to further explain the program transition and post-closure equipment operations. There are multiple communications planned prior to January 1, 2022, as well as follow-up communications after the rate migration is completed. These communications will be customized across the population of Energy Select customers to provide the most relevant information given the customer's current engagement level with the program. These communications will be delivered through multiple channels including mail, email, web messaging and potentially automated calling in order to maximize the reach of the message and will include information on ways to save through other programs and services. The Company is also developing comprehensive online resources to provide answers to commonly asked questions, tutorials for thermostat programming, and other device operation information.

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For the pool pump program, the Company plans to update the availability of this program on the Company's website upon Commission approval. The Company also plans to contact all of the enrolled PICs notifying them of the program closure.

**Florida Power & Light Company
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Request No. 6
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QUESTION:

Please refer to Attachment E of the Company's petition. For each of the programs listed below, provide the existing Program Standards and a type-and-strike version outlining any changes between the existing and the proposed Program Standards. For each change, please explain the reason for the modification.

- a. Residential Air Conditioning Program
- b. Residential Low Income Program
- c. Residential Ceiling Insulation Program

RESPONSE:

- a. Residential Air Conditioning Program – Please see Attachment No. 1 to this response for the existing Program Standards and a type-and-strike version. The reasons for the modifications include:
 - Expanded eligibility for program beyond single family homes – to align with the existing Gulf program standard.
 - Added heat pump option – to accommodate common equipment types in FPL's northern service area and Gulf's previous service area.
 - Remove the cap on SEER rating – to increase the number of eligible systems for the program.
- b. Residential Low Income Program – Please see Attachment No. 2 to this response for the existing Program Standards and a type-and-strike version. The reasons for the modifications include:
 - Adding "Community Energy Saver" program branding – to maintain continuity with existing program branding in Gulf's service area.
 - Clarifying customer eligibility – to align with current Gulf program model.
 - Adding a lighting measure – to increase the savings benefit for participating customers.
- c. Residential Ceiling Insulation Program – Please see Attachment No. 3 to this response for the existing Program Standards and a type-and-strike version. The reasons for the modifications include:
 - Clarifying customer eligibility – to simplify the eligibility criteria.
 - Eliminate the tiered rebate amount – to simplify the program administration.

Existing Version

Florida Power & Light Company

Residential Air Conditioning Program Standards

Effective: November 2, 2020

Existing Version
FPL Residential Air Conditioning Program Standards

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Existing Version

FPL Residential Air Conditioning Program Standards

Program Objective

Encourage customers to install high-efficiency air-cooled air conditioning systems (“A/C System”).

Eligibility Requirements

Customer must:

- Have an active FPL residential account.
- Reside in a residential single-family detached home (excludes manufactured or mobile homes).
- Have not received a rebate for the same A/C System within the past two years. This limitation may be waived, at FPL’s sole discretion, if the A/C System is damaged by a state or federally recognized natural disaster, tornado, fire or the like.
- Select an A/C System that meets all equipment specifications.
- Select, verify and hire a Participating Independent Contractor (“PIC”) to perform the installation work.
 - Governmental entities, including local, state and federal agencies may, with FPL’s pre-approval, perform installations themselves provided they comply with all other Program Standards requirements.

A/C Systems must reflect the following specifications:

- Straight-cool, electric-driven, air-cooled system with a Seasonal Energy Efficiency Ratio (“SEER”) of 16 or 17.
- New (i.e., cannot be refurbished, previously installed or used).
- Certified by the Air Conditioning, Heating & Refrigeration Institute (“AHRI”) as listed on its website (www.ahridirectory.org) and listed (including any supplemental devices) by Underwriters Laboratories (“UL”) or another nationally recognized testing organization in accordance with UL standards.

Installation by the PIC must:

- Completely replace an existing electric-driven cooling system (i.e., condenser, blower, coil, and any supplemental devices). Replacement of only some components does not qualify.
- If the existing A/C System is connected to an FPL Load Management (On Call[®]) transponder, the FPL low voltage wire must be disconnected from the existing thermostat and reconnected to the new thermostat.
 - The reconnection must be acknowledged in FPL’s Web Incentive Processing System (“WIPS”).
- Systems with non-electric heating or no heating can be replaced with like heating.

PIC Requirements

- FPL at its sole discretion will determine the number of PICs eligible to participate in the Program.
- PIC is required to comply with all requirements of these Program Standards and a failure to comply can result in denial of the rebate and the PIC’s removal from participation in the Program.
- PIC must sign an agreement with FPL regarding participation in the Program. This is separate and independent from any agreement between the customer and the PIC.
- PIC must be a licensed mechanical or air conditioning contractor in good standing in the State of Florida at all times.

Existing Version

FPL Residential Air Conditioning Program Standards

Rebate Amount and PIC Reimbursement Processing

Rebate Amount

- \$150 per installation.
- The rebate amount must appear as an itemized credit on the PIC's invoice to the customer and the customer must have paid the amount net of the rebate.

PIC Reimbursement Processing

- PIC shall complete the Residential Air Conditioning Rebate Certificate (including obtaining the customer's signature) and leave one copy with the customer.
- PIC shall submit its rebate reimbursement request and all required documentation online through WIPS in a timely and accurate manner, or through any other administrative process as may be established by FPL.
- For the sole purpose of ensuring Program compliance in order to issue the rebate, FPL reserves the right to verify any installation and will be the sole determiner of whether the requirements of these Program Standards have been met. Customer must allow access for this purpose.

Participation Limitation

FPL will close current-year participation if FPL determines that additional participation is not needed to achieve its approved Residential sector annual Goals. FPL's prior commitments related to customer installations in progress at the time of such closure will be honored in compliance with these Program Standards. The Program will be reopened to new participants January 1st of the following year. FPL will provide customer and PIC messaging through its normal communication channels, which may include FPL's website, customer care center and other FPL representatives.

Reporting Requirements

Program costs will be reported to the Commission in FPL's Energy Conservation Cost Recovery ("ECCR") True-Up and Projection filings. Program achievements will be reported in FPL's Demand-Side Management ("DSM") Annual Report.

Disclaimers

The issuance of a rebate by FPL under the Program shall not be considered or relied upon by the customer to be confirmation that: (i) the customer has selected the proper A/C system for their residence; and/or (ii) that any of the underlying work performed by the PIC was done properly pursuant to the manufacturer recommendations and specifications, building codes, other applicable laws, industry standards or individual contract requirements. FPL does not participate in or approve the selection of the A/C system and does not manage or provide oversight of the work performed by the PIC selected and hired by the customer. It is the sole responsibility of the customer to investigate and select an A/C system that is appropriate for their specific application, perform their own due diligence in selecting the PIC, manage the PIC they select and hire to perform the work, and to take the necessary precautions they deem prudent to ensure the equipment, materials, and work meets their expectations.

FPL does not provide any supervision, control or instructions to PICs regarding the means and methods for performing any work that might be eligible for a rebate. This is entirely the responsibility of the PIC who is

Existing Version

FPL Residential Air Conditioning Program Standards

an independent contractor and likewise the sole responsibility of the customer to manage and inspect the work performed by the PIC. FPL provides no guaranty or warranty regarding the amount of energy savings to be expected, the equipment and/or the work provided by the PIC.

Type-and-Strike Version

Florida Power & Light Company

Residential Air Conditioning Program Standards

Effective: ~~November 2, 2020~~ January 1, 2022

Type-and-Strike Version
FPL Residential Air Conditioning Program Standards

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Type-and-Strike Version

FPL Residential Air Conditioning Program Standards

Program Objective

Encourage customers to install high-efficiency air-cooled air conditioning systems (“A/C System”).

Eligibility Requirements

Customer must:

- Have an active FPL residential account.
- Reside in a residential single-family detached or multi-family home (excludes manufactured or mobile homes).
- Have not received a rebate for the same A/C System within the past two years. This limitation may be waived, at FPL’s sole discretion, if the A/C System is damaged by a state or federally recognized natural disaster, tornado, fire or the like.
- Select an A/C System that meets all equipment specifications.
- Select, verify and hire a Participating Independent Contractor (“PIC”) to perform the installation work.
 - Governmental entities, including local, state and federal agencies may, with FPL’s pre-approval, perform installations themselves provided they comply with all other Program Standards requirements.

A/C Systems must reflect the following specifications:

- Straight-cool and heat pump, electric-driven, air-cooled system with a Seasonal Energy Efficiency Ratio (“SEER”) of 16 or ~~17~~ higher.
- New (*i.e.*, cannot be refurbished, previously installed or used).
- Certified by the Air Conditioning, Heating & Refrigeration Institute (“AHRI”) as listed on its website (www.ahridirectory.org) and listed (including any supplemental devices) by Underwriters Laboratories (“UL”) or another nationally recognized testing organization in accordance with UL standards.

Installation by the PIC must:

- Completely replace an existing electric-driven cooling system (*i.e.*, condenser, blower, coil, and any supplemental devices). Replacement of only some components does not qualify.
- If the existing A/C System is connected to an FPL Load Management (On Call[®]) transponder, the FPL low voltage wire must be disconnected from the existing thermostat and reconnected to the new thermostat.
 - The reconnection must be acknowledged in FPL’s Web Incentive Processing System (“WIPS”).
- Systems with non-electric heating or no heating can be replaced with like heating.

PIC Requirements

- FPL at its sole discretion will determine the number of PICs eligible to participate in the Program.
- A PIC is required to comply with all requirements of these Program Standards and a failure to comply can result in denial of the rebate and the PIC’s removal from participation in the Program.
- PIC must sign an agreement with FPL regarding participation in the Program. This is separate and independent from any agreement between the customer and the PIC.
- PIC must be a licensed mechanical or air conditioning contractor in good standing in the State of Florida at all times.

Type-and-Strike Version

FPL Residential Air Conditioning Program Standards

Rebate Amount and PIC Reimbursement Processing

Rebate Amount

- \$150 per installation.
- The rebate amount must appear as an itemized credit on the PIC's invoice to the customer and the customer must have paid the amount net of the rebate.

PIC Reimbursement Processing

- PIC shall complete the Residential Air Conditioning Rebate Certificate (including obtaining the customer's signature) and leave one copy with the customer.
- PIC shall submit its rebate reimbursement request and all required documentation online through WIPS in a timely and accurate manner, or through any other administrative process as may be established by FPL.
- For the sole purpose of ensuring Program compliance in order to issue the rebate, FPL reserves the right to verify any installation and will be the sole determiner of whether the requirements of these Program Standards have been met. Customer must allow access for this purpose.

Participation Limitation

FPL will close current-year participation if FPL determines that additional participation is not needed to achieve its approved Residential sector annual Goals. FPL's prior commitments related to customer installations in progress at the time of such closure will be honored in compliance with these Program Standards. The Program will be reopened to new participants January 1st of the following year. FPL will provide customer and PIC messaging through its normal communication channels, which may include FPL's website, customer care center and other FPL representatives.

Reporting Requirements

Program costs will be reported to the Commission in FPL's Energy Conservation Cost Recovery ("ECCR") True-Up and Projection filings. Program achievements will be reported in FPL's Demand-Side Management ("DSM") Annual Report.

Disclaimers

The issuance of a rebate by FPL under the Program shall not be considered or relied upon by the customer to be confirmation that: (i) the customer has selected the proper A/C ~~system~~System for their residence; and/or (ii) that any of the underlying work performed by the PIC was done properly pursuant to the manufacturer recommendations and specifications, building codes, other applicable laws, industry standards or individual contract requirements. FPL does not participate in or approve the selection of the A/C ~~system~~System and does not manage or provide oversight of the work performed by the PIC selected and hired by the customer. It is the sole responsibility of the customer to investigate and select an A/C ~~system~~System that is appropriate for their specific application, perform their own due diligence in selecting the PIC, manage the PIC they select and hire to perform the work, and to take the necessary precautions they deem prudent to ensure the equipment, materials, and work meets their expectations.

FPL does not provide any supervision, control or instructions to PICs regarding the means and methods for performing any work that might be eligible for a rebate. This is entirely the responsibility of the PIC who is

Type-and-Strike Version

FPL Residential Air Conditioning Program Standards

an independent contractor and likewise the sole responsibility of the customer to manage and inspect the work performed by the PIC. FPL provides no guaranty or warranty regarding the amount of energy savings to be expected, the equipment and/or the work provided by the PIC.

Existing Version

Florida Power & Light Company

Residential Low Income Program Standards

Effective: November 2, 2020

Existing Version
FPL Residential Low Income Program Standards

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FPL Residential Low Income Program Standards

Program Objective

Assist low income customers through FPL-conducted “Power to Save” Energy Retrofits and state Weatherization Assistance Provider (“WAP”) agencies.

Eligibility Requirements

Customer must:

- Have an active FPL residential account.
- For FPL “Power to Save” Energy Retrofits, reside in an area with a large proportion of customers whose incomes are consistent with WAP qualification requirements.
- For WAP-provided measures, meet WAP low-income eligibility criteria.
- Live in a residence with whole house cooling or heating.
- Have not previously received an FPL rebate for the same measure.

WAP must:

- Qualify all customers using Federal and State guidelines.
- Conduct an audit using either the National Energy Audit Tool (“NEAT”) or an FPL-approved method.
- Be responsible for all work performed by itself or by its designated contractor(s).

Rebate Amount and WAP Reimbursement Processing

Customers will receive the measures for free whether provided through an FPL “Power to Save” Energy Retrofit or a WAP agency.

WAP Rebate Amount (per home)

- Weatherization/Infiltration \$90
- Air conditioning:
 - Duct testing & repair \$60
 - Unit maintenance \$80
 - Outdoor coil cleaning \$60
- Water heating:
 - Low flow showerhead \$30
 - Faucet aerator \$10
 - Pipe wrap \$40

WAP Reimbursement Processing

- WAP shall submit the Low Income Weatherization Rebate Form to FPL within 90 days of installation.
- For the sole purpose of ensuring program compliance in order to issue the rebate, FPL reserves the right to verify any installation and will be the sole determiner of whether the requirements of these Program Standards have been met. Customer must allow access for this purpose.
- Rebate will be paid to the WAP or its designee.
- WAP must correct any deficiency in installation or materials identified by FPL within 90 days of notification.

Existing Version

FPL Residential Low Income Program Standards

Participation Limitation

FPL will close current-year participation if FPL determines that additional participation is not needed to achieve its approved Residential sector annual Goals. FPL's prior commitments related to customer installations in progress at the time of such closure will be honored in compliance with these Program Standards. The Program will be reopened to new participants January 1st of the following year. FPL will provide customer messaging through its normal communication channels, which may include FPL's website, customer care center and other FPL representatives.

Reporting Requirements

Program costs will be reported to the Commission in FPL's Energy Conservation Cost Recovery ("ECCR") True-Up and Projection filings. Program achievements will be reported in FPL's Demand-Side Management ("DSM") Annual Report.

Disclaimers

The issuance of a rebate by FPL under the Program shall not be considered or relied upon by the customer to be confirmation that any of the underlying work performed by the WAP agency was done properly pursuant to the manufacturer recommendations and specifications, building codes, other applicable laws, industry standards or individual contract requirements. FPL does not participate in or approve the selection of conservation measures installed by the WAP agencies and does not manage or provide oversight of the work performed by the WAP agency. It is the sole responsibility of the customer and the WAP agencies to investigate and select conservation measures that are appropriate for their specific application, perform the work and to take the necessary precautions they deem prudent to ensure the equipment, materials, and work meets their expectations.

FPL does not provide any supervision, control or instructions to WAP agencies regarding the means and methods for performing any work that might be eligible for a rebate. This is entirely the responsibility of the WAP and likewise the sole responsibility of the customer to manage and inspect the work performed by the WAP. FPL provides no guaranty or warranty regarding the amount of energy savings to be expected, the equipment and/or the work provided by the WAP agencies.

Type-and-Strike Version

Florida Power & Light Company

Residential Low Income Program Standards

Effective: ~~November 2, 2020~~ January 1, 2022

Type-and-Strike Version
FPL Residential Low Income Program Standards

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FPL Residential Low Income Program Standards

Program Objective

Assist low income customers through FPL-conducted “Power to Save” Energy Retrofits, [“Community Energy Saver”](#), and state Weatherization Assistance Provider (“WAP”) agencies.

Eligibility Requirements

Customer must:

- Have an active FPL residential account.
- For FPL “Power to Save” Energy Retrofits or [“Community Energy Saver”](#), reside in an area ~~with a large proportion~~ where the majority of customers ~~whose~~ incomes are ~~consistent with WAP-qualification requirements~~ below 200% of the federal poverty level.
- For WAP-provided measures, meet WAP low-income eligibility criteria.
- Live in a residence with whole house cooling or heating.
- Have not previously received an FPL rebate for the same measure.

WAP must:

- Qualify all customers using Federal and State guidelines.
- Conduct an audit using either the National Energy Audit Tool (“NEAT”) or an FPL-approved method.
- Be responsible for all work performed by itself or by its designated contractor(s).

Rebate Amount and WAP Reimbursement Processing

Customers will receive the measures for free whether provided through an FPL “Power to Save” Energy Retrofit, [“Community Energy Saver”](#) or a WAP agency.

WAP Rebate Amount (per home)

- Weatherization/Infiltration \$90
- Air conditioning:
 - Duct testing & repair \$60
 - Unit maintenance \$80
 - Outdoor coil cleaning \$60
- Water heating:
 - Low flow showerhead \$30
 - Faucet aerator \$10
 - Pipe wrap \$40
- Lighting
 - LED bulbs (up to 5) \$6

WAP Reimbursement Processing

- WAP shall submit the Low Income Weatherization Rebate Form to FPL within 90 days of installation.
- For the sole purpose of ensuring program compliance in order to issue the rebate, FPL reserves the right to verify any installation and will be the sole determiner of whether the requirements of these Program Standards have been met. Customer must allow access for this purpose.
- Rebate will be paid to the WAP or its designee.

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- WAP must correct any deficiency in installation or materials identified by FPL within 90 days of notification.

Participation Limitation

FPL will close current-year participation if FPL determines that additional participation is not needed to achieve its approved Residential sector annual Goals. FPL's prior commitments related to customer installations in progress at the time of such closure will be honored in compliance with these Program Standards. The Program will be reopened to new participants January 1st of the following year. FPL will provide customer messaging through its normal communication channels, which may include FPL's website, customer care center and other FPL representatives.

Reporting Requirements

Program costs will be reported to the Commission in FPL's Energy Conservation Cost Recovery ("ECCR") True-Up and Projection filings. Program achievements will be reported in FPL's Demand-Side Management ("DSM") Annual Report.

Disclaimers

The issuance of a rebate by FPL under the Program shall not be considered or relied upon by the customer to be confirmation that that any of the underlying work performed by the WAP agency was done properly pursuant to the manufacturer recommendations and specifications, building codes, other applicable laws, industry standards or individual contract requirements. FPL does not participate in or approve the selection of conservation measures installed by the WAP agencies and does not manage or provide oversight of the work performed by the WAP agency. It is the sole responsibility of the customer and the WAP agencies to investigate and select conservation measures that are appropriate for their specific application, perform the work and to take the necessary precautions they deem prudent to ensure the equipment, materials, and work meets their expectations.

FPL does not provide any supervision, control or instructions to WAP agencies regarding the means and methods for performing any work that might be eligible for a rebate. This is entirely the responsibility of the WAP and likewise the sole responsibility of the customer to manage and inspect the work performed by the WAP. FPL provides no guaranty or warranty regarding the amount of energy savings to be expected, the equipment and/or the work provided by the WAP agencies.

Existing Version

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Residential Ceiling Insulation Program Standards

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Existing Version

FPL Residential Ceiling Insulation Program Standards

Program Objective

Encourage customers to improve the building envelope's thermal efficiency.

Eligibility Requirements

Customer must:

- Have an active FPL residential account.
- Reside in a premise constructed before 1982.
- Have whole house electric air conditioning and heating.
- Have not received a ceiling insulation rebate within the last 20 years.
- Select, verify and hire a Participating Independent Contractor ("PIC") to perform the installation work.
 - Governmental entities, including local, state and federal agencies, may, with FPL's pre-approval, perform installations themselves provided they comply with all other Program Standards requirements.
- Provide access to all attic spaces in order for either FPL to determine rebate eligibility or PIC to determine and demonstrate to FPL such eligibility.
- Have a verified ceiling insulation R-value of less than R-8.
- Select ceiling insulation that meets all material specifications.

Ceiling Insulation material must reflect the following specifications:

- Have a specified R-Value.
- Include, but not limited to, the following insulation types; blown-in, batt, blanket, and sprayed foam or fiber.
- New (*i.e.*, not refurbished, previously installed or otherwise used).
- Thermal properties, technical specifications, and performance characteristics independently tested and verified using the applicable test methods/standards established by the American Society of Testing and Materials ("ASTM") or based on other FPL-approved calculations and test methods, where appropriate.

Installation by the PIC must:

- Be installed uniformly on the ceiling as a direct application to insulate the full attic to a minimum R-value of R-30 for climate zone 1 (Miami-Dade, Broward and Monroe counties) or R-38 for climate zone 2 (rest of FPL territory) over all conditioned space including the scuttle hole (additions or renovations do not qualify).
- Be located in an accessible attic (inaccessible attics and flat roof installations are not eligible).
- Not be installed on top of unfinished (drop) ceilings.
- Not cover soffits or any other type of attic ventilation system.
- Have minimum clearance around all recessed lighting and gas-fired appliances as stipulated in state, county and local codes.
- Leave a product specification sheet for FPL at the premises.

Existing Version

FPL Residential Ceiling Insulation Program Standards

PIC Requirements

- FPL at its sole discretion will determine the number of PICs eligible to participate in the Program.
- PIC must comply with all requirements of these Program Standards and a failure to comply can result in denial of the rebate and the PIC's removal from participation in the Program.
- PIC must sign an agreement with FPL regarding their overall participation in the Program. This is separate and independent from any agreement between the customer and the PIC.
- PIC must have the appropriate license in good standing to perform the work.

Rebate Amount and PIC Reimbursement Processing

Rebate Amount

<u>Existing R-value</u>	<u>Rebate Amount</u>
R0-R2	\$190
R3-R8	\$95

- No rebate payment shall exceed the customer's payment to the PIC which may include both materials and applicable labor.
- The rebate amount must appear as an itemized credit on the PIC's invoice to the customer and the customer must have paid the amount net of the rebate.

PIC Reimbursement Processing

- Before installation begins a rebate certificate must be issued to the customer by an FPL representative or PIC.
- After installation, the customer or customer's designee will give the customer-signed rebate certificate to the PIC as partial payment. A rebate certificate cannot be exchanged for cash.
- PIC must submit to FPL date-stamped photo or video documentation showing the before and after R-value levels and any other supporting documentation as required by FPL (*e.g.*, product specification sheet, etc.).
- PIC shall complete and submit its rebate reimbursement request and all required documentation online through FPL's Web Incentive Processing System ("WIPS"), or any other administrative process as may be established by FPL.
- For the sole purpose of ensuring Program compliance in order to issue the rebate, FPL reserves the right to verify any installation and will be the sole determiner of whether the requirements of these Program Standards have been met. Customer must allow access for this purpose.

Participation Limitation

FPL will close current-year participation if FPL determines that additional participation is not needed to achieve its approved Residential sector annual Goals. FPL's prior commitments related to customer installations in progress at the time of such closure will be honored in compliance with these Program Standards. The Program will be reopened to new participants January 1st of the following year. FPL will provide customer and PIC messaging through its normal communication channels, which may include FPL's website, customer care center and other FPL representatives.

Existing Version

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Reporting Requirements

Program costs will be reported to the Commission in FPL's Energy Conservation Cost Recovery ("ECCR") True-Up and Projection filings. Program achievements will be reported in the FPL's Demand-Side Management ("DSM") Annual Report.

Disclaimers

The issuance of a rebate by FPL under the Program shall not be considered or relied upon by the customer to be confirmation that: (i) the customer has selected the proper ceiling insulation for their residence; and/or (ii) that any of the underlying work performed by the PIC was done properly pursuant to the manufacturer recommendations and specifications, building codes, other applicable laws, industry standards or individual contract requirements. FPL does not participate in or approve the selection of the ceiling insulation and does not manage or provide oversight of the work performed by the PIC selected and hired by the customer. It is the sole responsibility of the customer to investigate and select ceiling insulation that is appropriate for their specific application, perform their own due diligence in selecting the PIC, manage the PIC they select and hire to perform the work, and to take the necessary precautions they deem prudent to ensure the equipment, materials, and work meets their expectations.

FPL does not provide any supervision, control or instructions to PICs regarding the means and methods for performing any work that might be eligible for a rebate. This is entirely the responsibility of the PIC who is an independent contractor and likewise the sole responsibility of the customer to manage and inspect the work performed by the PIC. FPL provides no guaranty or warranty regarding the amount of energy savings to be expected, the material and/or the work provided by the PIC.

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Program Objective

Encourage customers to improve the building envelope's thermal efficiency.

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- Have whole house electric air conditioning and heating.
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Rebate Amount

<u>Existing R-value</u>	<u>Rebate Amount</u>
R0-R2 8	\$190 \$220
R3-R8	\$95

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