

STATE OF FLORIDA

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Public Service Commission

February 14, 2022

Michael G. Cooke
Greenberg Traurig, P.A.
101 E. Kennedy Blvd., Suit 1900
Tampa, Florida 33602
cookem@gtlaw.com

SENT
VIA E-MAIL

COMMISSION
CLERK

2022 FEB 14 AM 10:08

RECEIVED-FPSC

Re: Docket No. 20220017-EU - In re: Petition for declaratory statement regarding Rule 25-6.049(5)(b), F.A.C., by EcoSmart Solution, LLC.

Dear Mr. Cooke:

Commission staff is reviewing the Petition for Declaratory Statement by EcoSmart Solution, LLC (Petition) and needs additional facts in order to address EcoSmart's Petition. Please provide answers to the following questions:

1. Please provide the address of the proposed complex and identify which electric utility will service the complex.
2. Please explain how the geothermal heat pumps listed in Section IV (page 4) of the Petition qualify for an exception from the individual metering requirement under Rule 25-6.049(5)(b), F.A.C.
3. How many geothermal domestic water heaters will be installed under this design? Please describe where these units will be located in the facility and how these units qualify for an exception from the individual metering requirement under Rule 25-6.049(5)(b), F.A.C.
4. Will the heated water in individual apartments be a byproduct from the geothermal system or will customers be individually metered for the energy used for water heating? Please explain.
5. Will each residential unit be fitted with separate HVAC air handlers, exchangers, thermostats, etc.? If so, will this equipment be metered through the individual unit meters or the complex's master meter? Please explain.

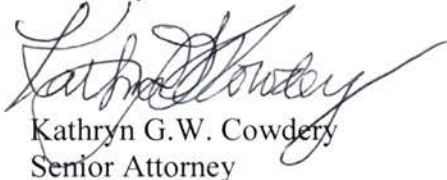
6. Please explain who will be the customer of record for the utility net meter (listed in Exhibit B) at the time of occupancy. Will it be EcoSmart, the owner of the development, or a third party? If a third party, how will EcoSmart ensure compliance to the proposed process?
7. Under Section IV, (page 6) of the Petition, it states that the geothermal systems “will be interconnected through sub meters [*landlord sub meters listed in Exhibit B*] with a house panel in each of the buildings that is served by a utility meter.” Please explain the purpose of these submeters and how these submeters could impact the residential usage and allocated costs of the geothermal system to the residence of the building.
8. Per Rule 25-6.049(9), F.A.C., please explain how EcoSmart intends to calculate, and allocate, the actual residential usage costs of the geothermal system to each unit, as referenced on the bottom of page 6 of the Petition (also described as “allocation methods” in Sections II.b. and VII.b. of the Petition).
9. Please describe how residents will be billed for the costs associated with the geothermal facilities (i.e. separate monthly bill, as part of monthly rent, etc.)?
10. Since residents would receive service from both the utility (under individual meters) and a separate charge for the geothermal system services, how will management handle an outstanding balance for the HVAC/hot water service?
11. Please explain in detail what costs are included in the “service charges” referenced in Sections II.b. and VII.b. of the Petition.
12. Please describe in detail what is meant by “the cost of providing the service” as stated in Sections II.b. and VII.b. of the Petition.
13. Please explain in detail what costs are being referred to in Section V on page 8 of the Petition where it is stated: “The costs of operating the geothermal system, including the cost of any electricity it uses, will be recovered.” This explanation should include:
 - a. Whether there are costs that will be recovered other than the cost of electricity used by the geothermal system and what those costs are; and
 - b. Specifically how these costs “will be recovered.”
14. Please explain if the Domestic Water Heaters (DWH) will be solely powered by the Geothermal System. If not, please explain the other power sources for the DWH and how they would be metered.
15. Please refer to Exhibit “B” of the petition for the following questions.
 - a. Clarify if each individual dwelling unit will have its own DWH and ground source heat pump. If not, please explain what the arrangement is.

- b. Clarify the number of submeters present in each apartment and to what equipment they would be connected.
16. Clarify the size of the solar photovoltaic array(s) and how they would be electrically interconnected to the other loads. As part of your explanation, describe whether the panels would be directly or indirectly connected to each individual dwelling unit.
17. Please describe the nature of the contractual relationship between EcoSmart and the landlord regarding the ownership and/or operation of the geothermal system. If any contracts or agreements exist, please provide them. If no contracts or agreements exist, please explain on what basis EcoSmart would be compensated by the landlord for the geothermal system (such as a fixed monthly fee, production (heat or energy) based fee, or a hybrid method).

In order to provide sufficient time for this information to be reviewed prior to bringing a recommendation to a Commission Conference, please file your answers to these questions with the Commission Clerk in this docket no later than Monday, February 21, 2022.

Please let me know if you have any questions.

Sincerely,



Kathryn G.W. Cowdery
Senior Attorney

Cc: Commission Clerk