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April 27, 2022

#### **VIA: ELECTRONIC FILING**

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

Re: Docket No. 20220000-OT

2021 DSM Annual Report

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Responses to Staff's First Data Request (Nos. 1-12) dated April 7, 2022.

Thank you for your assistance in connection with this matter.

Sincerely,

Malcolm N. Means

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MNM/bmp Attachment

cc: TECO Regulatory Department

Mark Roche, TECO

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- 1. Please describe how Tampa Electric Company (TECO or Company) monitors federal energy efficiency standards and Florida Building Code requirements. Address in your response how the Company modifies existing programs to reflect changes when necessary.
- Α. Tampa Electric recognizes that staying on top of building codes and appliance efficiency standards is a challenge. To ensure that the Demand Side Management ("DSM") programs the company offers are aligned with building codes and appliance efficiency standards, Tampa Electric's Energy Management Services ("EMS") Department stays abreast and ahead of changing appliance efficiency standards and building codes including the current seventh version of the Florida Building Code that became effective on December 31, 2020. Tampa Electric also closely monitors for any new or proposed changes to building codes or appliance standards at the federal level which would make it necessary to modify any of the company's existing Commission approved DSM programs. In addition, the company has reviewed the upcoming July 28, 2023, revision of the American Society of Refrigerating, and Air-Conditioning Engineers ("ASHRAE") Standard 90.1-2019 and the 2021 International Energy Conservation Code to ensure there are no DSM programs that would require any modifications. The Program Managers and select EMS team members ensure the DSM programs the company offers are correctly positioned to enhance energy efficiency above the base/minimum level required. Here are specific examples of the company's approach for monitoring any new federal energy efficiency standards/codes or Florida Building Code requirements and identifying the resultant future impact to the existing DSM Program:
  - Tampa Electric's DSM Program Managers subscribe to the annual Florida Building Code - Energy Conservation Edition. The company has designated individual team members within EMS who are associated with the Florida Department of Business and Professional Regulation.
  - Tampa Electric's Commercial Energy Management Team ("CEMT") members receive updates from the State of Florida's Energy Technical Advisory Committee ("TAC") and actively participate in webinars offered by the TAC.
  - The CEMT belongs to several energy efficiency associations and consortiums such as the Association of Energy Engineers or the Consortium for Energy Efficiency.

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- The CEMT will also attend national level training events which provide insight into current and future industry changes along with legislative changes that are scheduled to occur.
- Program Managers are responsible for charting a timeline comparison with the current program standards and identifying the needed changes to ensure the program is in alignment with the new energy efficiency standard or building code.
- Program Managers meet annually with the company's Manager of Regulatory Rates to walk-through each DSM program to ensure the DSM program's standards are aligned with any new or upcoming changes to federal or state building codes or appliance energy efficiency requirements.
- Program Managers will reach out to recognized experts or vendors to discuss the impacts of changes and determine the most appropriate adjustments to make to the DSM program. A recent example of this is Tampa Electric's collaboration with the Environmental Protection Agency for the new ENERGY STAR Variable Speed Pool Pump program. This collaboration with industry experts helped directly guide the company's decision based on their input as to when and how they would recommend proceeding with new industry standards involving residential pool pump replacements. While manufacturing of single speed pool pumps ceased in July of 2021, it will take a number of years to cycle through all of the inventory of single speed pumps. As a result, these pumps may still be installed until inventory runs out or when the new requirements, expected in late 2024, will cause this program to be discontinued in the company's next DSM Plan.
- Program Managers that facilitate programs which have designated vendors ensure the vendor is aware of potential and future advancements in appliance energy efficiency standards and building codes. They also ensure that the vendor is positioning the supporting technology so that it is compatible with and enhances the overall program.
- Program Managers and individual team members also achieve professional certifications by attending classes, participating in trade shows, formal meetings, conferences, or other training events which cover appliance energy efficiency standards and building codes such as:
  - Certified Energy Manager (CEM)
  - Business Energy Professional (BEP)
  - Commercial Energy Auditor (CEA)
  - Residential Energy Auditor (REA)

- Demand Side Management Professional (CDSM)
- Florida Building Engineering & Facility Maintenance Show
- RESNET Certified Energy Rater seminars
- o Energy Management Congress events
- o EPA ENERGY STAR training
- o ENERGY STAR Certified Homes Stakeholder meeting
- Association of Energy Service Professionals (AESP)
- Association chapter meetings: Association of Energy Engineers (AEE), Tampa Bay Builders Association (TBBA), Refrigeration & Air Conditioning Contractors Association (RACCA) and ASHRAE

For any Commission approved DSM program modification that would change the contributions from that program (i.e., the winter or summer demand in kW or the annual energy in kWh), change the fundamental offering of the DSM program itself, or would result in any changes to the DSM standards would require the company to obtain Commission approval for this modification through a petition.

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- 2. Please answer the following regarding TECO's conservation research and development (CRD) initiatives that evaluate emerging DSM opportunities:
  - A. Identify and describe any new CRD initiatives that were launched in 2021.
  - B. On Pages 42-45 of the Company's 2021 DSM Annual Report filing, a Final Report is provided for the Home Energy Management System project, reflecting that a Rate Impact Measure (RIM) score of 0.93 was measured. Has TECO identified reasons why this program was not cost effective under the RIM test? Please explain your response.
  - C. On Pages 45-46 of the Company's 2021 DSM Annual Report filing, an update is provided for the Integrated Renewable Energy System Pilot Program. Please provide an update on the status of all other ongoing CRD initiatives that began before 2021. If applicable, attach interim and/or final reports on work completed in 2021.
- **A.** a. Tampa Electric did not initiate any new Conservation Research and Development ("CRD") initiatives in 2021.
  - b. Tampa Electric evaluated the cost-effectiveness of the Home Energy Management Systems and believes the following reasons are why the CRD evaluation resulted in a Rate Impact Measure ("RIM") score of less than 1.0:
    - 1. The demand contribution by the home energy management system is low. The summer demand kW savings are 0.010 and the winter kW demand savings are 0.100.
    - 2. The energy contribution on an annual basis is 461 kWh for a typical customer.
    - 3. The company set the administrative cost at \$50 per home due to the device installation within a customer's breaker panel that required county electrical permits.
    - 4. While not contributing to the failing 0.93 RIM score, the rebate amount was set to zero.
  - c. Tampa Electric initiated the following CRD activities prior to 2021 that remain active but not complete:

**Small to mid-size Commercial Battery Storage:** For the majority of 2021, this CRD project was in a waiting status due to the COVID-19 pandemic,

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which prevented the company from initiating the second phase of the original R&D Project plan. Upon the removal of the restriction of face-to-face interactions with customers and site visits in the beginning of November, the company is proceeding with the second phase of this CRD project by identifying one or two commercial facilities for potential battery installations. Tampa Electric has identified two preliminary facilities that include a 911-call center and a low-income community center. The company at the same time is still monitoring the costs of potential battery systems to ensure the benefits received by the analysis are not overly burdened by excessive costs. Below is the history of the CRD project as of the date of this filing:

In the last quarter of 2016, Tampa Electric partnered with the University of South Florida ("USF") College of Engineering to assist in the performance of this CRD project to evaluate the feasibility of potentially offering a battery storage DSM program for commercial/industrial customers. This CRD project will evaluate these small to mid-size commercial battery storage installations through research and field study with at least one battery being installed at a commercial/industrial customer's facility. Tampa Electric specified the size of battery for this CRD project to be between 10 kW and 150 kW with the project from inception to completion lasting approximately three-years. The original timeline was to afford enough time to study these batteries and potentially justify a DSM program within the company's 2020-2029 DSM Plan if the results were positive. The original R&D project was projected to cost approximately \$250,000 to achieve the following objectives:

- Evaluate the potential for battery storage for the use of load shifting on demand savings.
- Evaluate the efficiency of load shifting from a battery storage system and the associated control and monitoring system.
- Evaluate the impact on the total energy consumption of the battery and facility when used in a load shifting capacity (versus reliability).
- Evaluate and compare batteries based on performance and cycling tolerance when used in Florida's climate.
- Examine the associated costs from cradle to disposition of battery.
- Evaluate the load profile impact on power vs. capacity tradeoffs.

To achieve these objectives, the small to mid-size Commercial Battery Storage project was broken down into the following four main phases:

- 1. Battery selection
- 2. Identify commercial facilities
- 3. Battery vendor selection

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#### 4. Installation of storage system

Phase 1 was completed by USF in 2017. Tampa Electric included a copy of the battery research study in the company's annual DSM report that was filed with the Commission on March 1, 2018. In 2017, after completion of the initial portion of the CRD project, the company sought product availability and costs and found that the prices were greater than the allocation of funds allowed as an R&D program and placed the pursuit of this CRD project on hold until the prices of the batteries dropped to an acceptable level. The company's Commercial Energy Management Team ("CEMT") has continued to keep a pulse on the market and monitors the prices of the batteries to continue the CRD project. In addition to monitoring the prices of the batteries to continue the CRD project, Tampa Electric also filed for an increase in the allowable funds to be used for CRD in the company's most recently filed and Commission approved 2020-2029 DSM Plan. In the 2020-2029 DSM Plan, the program costs were increased on an annual basis from \$200,000 per year to \$400,000 per year and increased the five-year period total allowable costs from \$1,000,000 to \$2,000,000.

No reports have been provided by this CRD project at this time.

Commercial small to mid-sized business Online Energy Audit: In 2020, the company determined that the ability to provide a high quality online energy audit to a very diverse range of customer business types is not feasible or cost-effective at this time. In 2021, the company continued to monitor reinitiating this CRD project if the technology to support this type of DSM program offering increases and the cost decreases. No reports have been provided by this CRD project at this time.

Large Commercial Electric Vehicle Battery Storage: In 2020, this CRD project was included as a component of the Integrated Renewable Energy System (Pilot) program that was approved by the Commission. The company completed the construction of the Integrated Renewable Energy System in 2021 and began initial evaluations of the performance of the system in the beginning of 2022. No reports, beyond the lessons learned from the installation of the system, have been done at this time. All reports, including the final report, for this system will be included in the Integrated Renewable Energy System reports provided each year in the annual DSM reports provided to the Commission.

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Heat Pump Water Heater inclusion into the Energy Planner Program: Tampa Electric will evaluate the inclusion of residential heat pump water heaters/hybrid water heaters into the Energy Planner Program as an electric thermal storage device. At this time, this CRD is on hold due to the Energy Planner team members focusing on getting the new Prime Time Plus program implemented.

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- **3.** Please answer the following regarding TECO's Low Income Programs:
  - A. Describe the conservation efforts TECO used in 2021 to ensure lowincome customers are aware of, and have access to, conservation programs. Address in your response whether any of these efforts were changed or modified in 2021, compared to prior years.
  - B. Identify TECO's partnerships with government and non-profit agencies in 2021 designed to help identify low-income neighborhoods and educate customers on conservation opportunities.
- Α. Tampa Electric has several communication avenues to assist existing a. customers ensuring low-income customers are aware of, and have access to, the company's conservation programs. communications include social media Facebook and Twitter posts from Tampa Electric's Corporate Communications Department to all Tampa Electric customers, including low-income customers. These social media posts include announcing when, where and in what neighborhoods the company will be installing the Neighborhood Weatherization Program. In addition, these social media posts will provide information announcements on any upcoming community energy education and awareness events where the company will be promoting the Energy and Renewable Education, Awareness and Agency Outreach program. When customers attend an energy education and awareness event in the community, it affords the company the opportunity to engage the customer with an energy expert from Tampa Electric and to present valuable energy-saving tips and program information. Tampa Electric continued to grow its customer attendance over the past year by focusing on increasing the number of energy education and awareness events the company participates in. These events are free to customers who attend and attendees may be eligible to receive a free energy-savings kit.

Due to the COVID Pandemic that began in March 2020, Tampa Electric proactively communicated with customers since the suspension of non-essential conservation operations through the resuming of normal conservation operations on November 8, 2021. The company continued to promote non-customer contact programs via paid advertising channels including television, radio and online. The company also leveraged social owned channels including social media platforms, bill communications, website, direct mail and email

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to promote the company's DSM programs during these challenging times. In 2021, the company continued to encourage a level of assistance and participation to customers by continuing the increased emphasis on participation for low-income customers to participate in a Phone, Online or Virtual audit. In addition, all customers who have expressed interest in any of the programs that had been on hold were waitlisted and have been contacted as we have resumed operations.

b. Tampa Electric continued partnerships with Hillsborough County, specifically the Sustainability department along with Tampa Housing Authority to perform virtual energy education reaching the residential audience including low-income customers.

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- 4. In the responses to Staff's Second Data Request, dated June 16, 2021, relating to TECO's 2020 DSM Annual Report, the Company reported that it implemented the use of several technology tools or adjusted practices which allowed it to continue to offer DSM program(s) or services while still adhering to public health recommendations. Were all such tools and practices continued in 2021?
- A. Yes, Tampa Electric continued all of the tools and practices in 2021 that were initiated to assist customers with continued participation in the company's DSM programs during the COVID-19 Pandemic.

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- **5.** Please respond to the following questions regarding residential and commercial/industrial DSM programs for which TECO suspended on-site visits in 2021.
  - A. Discuss how TECO communicated with or responded to customers about suspended programs.
  - B. Discuss how, or if, TECO changed any aspect of its communication with customers to draw a distinction between suspended and non-suspended programs.
  - C. Describe any educational and/or promotional resources that were developed by TECO during 2021 to encourage participation in nonsuspended programs.
  - D. For each program for which the Company suspended on-site visits, please complete the following table:

[Progran	[Program Name] Wait List and Participation Details		ation Details
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait- Listed Participants
January 2021			
February 2021			
March 2021			
April 2021			
May 2021			
June 2021			
July 2021			
August 2021			
September 2021			
October 2021			
November			
2021			
December			
2021			
January 2022			

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February 2022		
March 2022		
(if available)		

A. Tampa Electric has proactively communicated with customers since the suspension of non-essential conservation operations which initially started on March 16, 2020. These communications include communicating to those customers wanting to participate in one or more of the company's DSM programs that have been affected by providing them specific information. These communications have also been targeted to the company's general body of customers by posting COVID messages and continuing to closely monitor and provide updates to customers. Below is an example of the pop-up message that was added to the company's website:



Tampa Electric continued to promote non-customer contact programs via paid advertising channels including television, radio and online. The company also leveraged social owned channels including social media platforms, bill communications, website, direct mail and email to promote the company's DSM programs during these challenging times.

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Tampa Electric's Energy Management Services ("EMS") staff and contractors were kept informed of specific process changes that allowed for continued participation in some of the company's COVID impacted DSM programs. This included continuing to allow extensions of insulation certificates and duct repair letters and also allowing customers to provide pictures of their qualifying energy efficient equipment install as an upload to their online rebate application.

**Waiting Lists:** Tampa Electric continued placing customers on wait lists, for customers wanting to participate in one or more of the company's DSM programs that was either fully suspended or had the on-site visit portion of the DSM program suspended. All customers awaiting a residential or commercial energy audit continued to be offered or have had an initial phone or virtual energy audit performed.

**DSM Program Facilitation:** Tampa Electric continued to provide additional levels of assistance to customers during the pandemic through emphasis on the Phone, Online and Virtual audit offerings for residential customers and Phone audit offerings for Commercial/Industrial customers.

Tampa Electric continued the messaging promoting the Online Energy Audit through the company's customer experience portal which promotes the DSM program. When customers enter the portal and login, a popup message appears asking if they are interested in completing an Online Energy Audit which allows them to select and perform the energy audit.

The company has continued to receive and process applications for DSM programs not requiring customer interaction and these have not experienced any measurable impact from COVID pandemic. The company continued to provide flexibility with normal application deadlines, while adhering to all the current Commission approved DSM Standards, to accommodate customers unable to utilize the original verification process or to allow for project extensions on the rebate process due to hardship, COVID restrictions or financial burdens. Tampa Electric's EMS Team members will review the project(s) and will extend the approval certificate date where applicable.

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Tampa Electric continued to allow for a different facilitation process to achieve verifications by allowing customers to provide "after installed" pictures of the install as an upload to their online rebate application.

Tampa Electric's Weatherization program continued mailing the comprehensive energy-efficiency kits to participating customers advising them to install what they were comfortable with installing and the remaining items would be installed by Tampa Electric when normal business operations resume. This continued to afford customers to start taking advantage of some energy savings now until the remaining portion of the kit is installed, and the other program measures can be performed (Walk-through energy audit, insulation and duct repair if needed).

Tampa Electric's CEMT continued to offer an online electronic signature tool which allows for customers to sign the necessary legally binding documentation to participate in one of the company's load management and demand response DSM programs.

- b. See Response No. 5a above.
- c. See Response No. 5a above.
- d. In general, the company suspended on-site visits and face-to face interactions with customers on March 16, 2020 and resumed normal operations on November 8, 2021. In addition, the company suspended on-site visits and face-to face interactions with customers on January 3, 2022 due to the spike in affected cases of the Omnicron variant. Tampa Electric resumed normal operations on January 31, 2022 when the severity of the Omnicron variant was determined to be much less than COVID-19.

In 2020, the company implemented processes which allowed nearly all of the company's DSM programs to continue to be offered and these processes were all carried over into 2022. The DSM programs that were remained impacted the most were the Residential and Commercial/Industrial walk-through energy Audits, Neighborhood weatherization, Energy and Renewable Education, Awareness and

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Agency Outreach and Energy Planner program due to these programs requiring on-site portions or face-to-face interactions.

The tables below for each program for which Tampa Electric suspended on-site visits and face-to-face interactions with customers show the months that a restriction was in effect, including the monthly program participation and customers in backlog:

#### Residential Walk-Through Audit (Free Energy Check)

Residential Walk-Through Energy Audit (Free Energy Check) Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	S	0	1,363	
Feb-21	S	0	1,400	
Mar-21	S	0	1,438	
Apr-21	S	0	1,476	
May-21	S	0	1,523	
Jun-21	S	0	1,575	
Jul-21	S	0	1,632	
Aug-21	S	3	1,687	
Sep-21	S	0	1,754	
Oct-21	S	2	1,807	
Nov-21	0	478	1,092	
Dec-21	0	552	299	
Jan-22	S	32	361	
Feb-22	0	354	0	
Mar-22	0	395	0	

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### **Residential Customer Assisted Energy Audit (Online)**

Residential CustomerAssisted Energy Audit (Online) Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	6,618	0	
Feb-21	0	3,806	0	
Mar-21	0	7,150	0	
Apr-21	0	5,482	0	
May-21	0	5,805	0	
Jun-21	0	5,202	0	
Jul-21	0	4,872	0	
Aug-21	0	5,486	0	
Sep-21	0	7,226	0	
Oct-21	0	6,218	0	
Nov-21	0	4,277	0	
Dec-21	0	3,409	0	
Jan-22	0	4,732	0	
Feb-22	0	7,484	0	
Mar-22	0	12,159	0	

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### Residential Computer Assisted Energy Audit (RCS)(Paid)

Residential Computer Assisted Energy Audit (RCS)(Paid) Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	S	0	0	
Feb-21	S	0	0	
Mar-21	S	0	0	
Apr-21	S	0	0	
May-21	S	0	0	
Jun-21	S	0	0	
Jul-21	S	0	0	
Aug-21	S	0	0	
Sep-21	S	0	0	
Oct-21	S	0	0	
Nov-21	0	0	0	
Dec-21	0	0	0	
Jan-22	S	0	0	
Feb-22	0	1	0	
Mar-22	0	0	0	

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### **Residential Ceiling Insulation**

Residential Ceiling Insulation Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	25	0	
Feb-21	0	26	0	
Mar-21	0	20	0	
Apr-21	0	38	0	
May-21	0	43	0	
Jun-21	0	36	0	
Jul-21	0	29	0	
Aug-21	0	29	0	
Sep-21	0	45	0	
Oct-21	0	31	0	
Nov-21	0	38	0	
Dec-21	0	22	0	
Jan-22	0	15	0	
Feb-22	0	26	0	
Mar-22	0	24	0	

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### **Residential Duct Repair**

Residential Duct Repair Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	0	0	
Feb-21	0	0	0	
Mar-21	0	70	0	
Apr-21	0	0	0	
May-21	0	32	0	
Jun-21	0	23	0	
Jul-21	0	0	0	
Aug-21	0	33	0	
Sep-21	0	0	0	
Oct-21	0	24	0	
Nov-21	0	58	0	
Dec-21	0	27	0	
Jan-22	0	0	0	
Feb-22	0	0	0	
Mar-22	0	48	0	

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### **Energy and Renewable Education, Awareness and Agency Outreach**

Energy and Renewable Education, Awareness and Agency Outreach Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait- Listed Participants	
Jan-21	0	191	0	
Feb-21	0	0	0	
Mar-21	0	0	0	
Apr-21	0	0	0	
May-21	0	162	0	
Jun-21	0	0	0	
Jul-21	0	0	0	
Aug-21	0	132	0	
Sep-21	0	0	0	
Oct-21	0	4	0	
Nov-21	0	29	0	
Dec-21	0	292	0	
Jan-22	0	0	0	
Feb-22	0	102	0	
Mar-22	0	494	0	

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# **ENERGY STAR for New Multi-Family Residences**

ENERGY STAR for New Multi-Family Residences Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	0	0
Feb-21	0	0	0
Mar-21	0	0	0
Apr-21	0	0	0
May-21	0	0	0
Jun-21	0	0	0
Jul-21	0	0	0
Aug-21	0	0	0
Sep-21	0	0	0
Oct-21	0	0	0
Nov-21	0	0	0
Dec-21	0	0	0
Jan-22	0	0	0
Feb-22	0	0	0
Mar-22	0	0	0

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#### **ENERGY STAR for New Homes**

ENERGY STAR for New Homes Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	52	0	
Feb-21	0	160	0	
Mar-21	0	38	0	
Apr-21	0	71	0	
May-21	0	68	0	
Jun-21	0	249	0	
Jul-21	0	79	0	
Aug-21	0	74	0	
Sep-21	0	83	0	
Oct-21	0	51	0	
Nov-21	0	57	0	
Dec-21	0	25	0	
Jan-22	0	16	0	
Feb-22	0	6	0	
Mar-22	0	83	0	

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### **ENERGY STAR Pool Pumps**

ENERGY STAR Pool Pumps Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	30	0	
Feb-21	0	27	0	
Mar-21	0	39	0	
Apr-21	0	39	0	
May-21	0	46	0	
Jun-21	0	74	0	
Jul-21	0	77	0	
Aug-21	0	67	0	
Sep-21	0	65	0	
Oct-21	0	63	0	
Nov-21	0	54	0	
Dec-21	0	46	0	
Jan-22	0	49	0	
Feb-22	0	38	0	
Mar-22	0	86	0	

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#### **ENERGY STAR Thermostats**

ENERGY STAR Thermostats Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	71	0	
Feb-21	0	74	0	
Mar-21	0	81	0	
Apr-21	0	68	0	
May-21	0	80	0	
Jun-21	0	95	0	
Jul-21	0	75	0	
Aug-21	0	70	0	
Sep-21	0	69	0	
Oct-21	0	55	0	
Nov-21	0	93	0	
Dec-21	0	119	0	
Jan-22	0	105	0	
Feb-22	0	75	0	
Mar-22	0	75	0	

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### **Residential Heating and Cooling**

Residential Heating and Cooling Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	233	0
Feb-21	0	197	0
Mar-21	0	275	0
Apr-21	0	271	0
May-21	0	253	0
Jun-21	0	308	0
Jul-21	0	220	0
Aug-21	0	304	0
Sep-21	0	222	0
Oct-21	0	212	0
Nov-21	0	214	0
Dec-21	0	131	0
Jan-22	0	219	0
Feb-22	0	177	0
Mar-22	0	173	0

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# **Neighborhood Weatherization**

Neighborhood Weatherization Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	S	200	1,307
Feb-21	S	306	1,357
Mar-21	S	507	1,425
Apr-21	S	111	1,482
May-21	S	156	1,561
Jun-21	S	288	1,654
Jul-21	S	229	1,752
Aug-21	S	243	1,846
Sep-21	S	245	1,926
Oct-21	S	153	1,989
Nov-21	0	257	1,579
Dec-21	0	228	1,222
Jan-22	S	23	1,258
Feb-22	0	459	0
Mar-22	0	1,168	0

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### **Residential Price Responsive Load Management (Energy Planner)**

Energy Planner Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	S	4913	706
Feb-21	S	4870	745
Mar-21	S	4833	791
Apr-21	S	4807	829
May-21	S	4771	859
Jun-21	S	4711	898
Jul-21	S	4684	931
Aug-21	S	4637	971
Sep-21	S	4598	1034
Oct-21	S	4545	1035
Nov-21	S	4506	1112
Dec-21	S	4459	1132
Jan-22	S	4416	1136
Feb-22	0	4385	1199
Mar-22	0	4355	1266

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#### **Residential Prime Time Plus**

Prime Time Plus Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	Note 1	0	0
Feb-21	Note 1	0	0
Mar-21	Note 1	0	0
Apr-21	Note 1	0	0
May-21	Note 1	0	0
Jun-21	Note 1	0	0
Jul-21	Note 1	0	0
Aug-21	Note 1	0	0
Sep-21	Note 1	0	0
Oct-21	Note 1	0	0
Nov-21	Note 1	0	0
Dec-21	Note 1	0	0
Jan-22	Note 1	0	0
Feb-22	Note 1	0	0
Mar-22	Note 1	0	0

Note 1: Program is still being developed for Implementation in late 2022

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### **Residential Window Replacement**

Residential Window Replacement Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	149	0
Feb-21	0	113	0
Mar-21	0	115	0
Apr-21	0	104	0
May-21	0	80	0
Jun-21	0	93	0
Jul-21	0	91	0
Aug-21	0	103	0
Sep-21	0	78	0
Oct-21	0	84	0
Nov-21	0	83	0
Dec-21	0	83	0
Jan-22	0	106	0
Feb-22	0	80	0
Mar-22	0	81	0

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### Commercial/Industrial Audit (Free)

Commercial/Industrial Audit (Free) Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	S	0	186
Feb-21	S	0	193
Mar-21	S	0	208
Apr-21	S	0	222
May-21	S	0	237
Jun-21	S	0	247
Jul-21	S	0	260
Aug-21	S	0	275
Sep-21	S	0	280
Oct-21	S	0	292
Nov-21	0	57	224
Dec-21	0	44	201
Jan-22	S	42	123
Feb-22	0	39	77
Mar-22	0	105	0

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### **Comprehensive Commercial/Industrial Audit (Paid)**

Comprehensive Commercial/Industrial Audit (Paid) Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	S	0	0
Feb-21	S	0	0
Mar-21	S	0	0
Apr-21	S	0	0
May-21	S	0	0
Jun-21	S	0	0
Jul-21	S	0	0
Aug-21	S	0	0
Sep-21	S	0	0
Oct-21	S	0	0
Nov-21	0	0	0
Dec-21	0	0	0
Jan-22	S	0	0
Feb-22	0	0	0
Mar-22	0	0	0

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### **Commercial Chiller**

Commercial Chiller Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	0	0
Feb-21	0	0	0
Mar-21	0	0	0
Apr-21	0	0	0
May-21	0	0	0
Jun-21	0	0	0
Jul-21	0	0	0
Aug-21	0	0	0
Sep-21	0	0	0
Oct-21	0	0	0
Nov-21	0	0	0
Dec-21	0	0	0
Jan-22	0	0	0
Feb-22	0	0	0
Mar-22	0	0	0

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# Cogeneration

Cogeneration Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	0	0
Feb-21	0	0	0
Mar-21	0	0	0
Apr-21	0	0	0
May-21	0	0	0
Jun-21	0	0	0
Jul-21	0	0	0
Aug-21	0	0	0
Sep-21	0	0	0
Oct-21	0	0	0
Nov-21	0	0	0
Dec-21	0	0	0
Jan-22	0	0	0
Feb-22	0	0	0
Mar-22	0	0	0

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#### **Conservation Value**

Conservation Value Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	0	0
Feb-21	0	0	0
Mar-21	0	0	0
Apr-21	0	0	0
May-21	0	0	0
Jun-21	0	0	0
Jul-21	0	0	0
Aug-21	0	0	0
Sep-21	0	0	0
Oct-21	0	0	0
Nov-21	0	0	0
Dec-21	0	0	0
Jan-22	0	0	0
Feb-22	0	0	0
Mar-22	0	0	0

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# **Commercial Cooling**

Commerical Cooling Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	10	0
Feb-21	0	0	0
Mar-21	0	0	0
Apr-21	0	0	0
May-21	0	2	0
Jun-21	0	0	0
Jul-21	0	0	0
Aug-21	0	0	0
Sep-21	0	11	0
Oct-21	0	0	0
Nov-21	0	2	0
Dec-21	0	19	0
Jan-22	0	23	0
Feb-22	0	0	0
Mar-22	0	10	0

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#### **Demand Response**

Commerical Demand Response Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	0	0	
Feb-21	0	0	0	
Mar-21	0	0	0	
Apr-21	0	0	0	
May-21	0	0	0	
Jun-21	0	0	0	
Jul-21	0	0	0	
Aug-21	0	0	0	
Sep-21	0	0	0	
Oct-21	0	0	0	
Nov-21	0	0	0	
Dec-21	0	0	0	
Jan-22	0	0	0	
Feb-22	0	0	0	
Mar-22	0	0	0	

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#### **Facility Energy Management System**

Facility Energy Management System Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	0	0
Feb-21	0	0	0
Mar-21	0	0	0
Apr-21	0	0	0
May-21	0	0	0
Jun-21	0	0	0
Jul-21	0	0	0
Aug-21	0	0	0
Sep-21	0	0	0
Oct-21	0	1	0
Nov-21	0	1	0
Dec-21	0	0	0
Jan-22	0	1	0
Feb-22	0	0	0
Mar-22	0	0	0

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### **Industrial Load Management (GSLM 2&3)**

Industrial Load Management (GSLM 2&3) Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	0	0	
Feb-21	0	0	0	
Mar-21	0	0	0	
Apr-21	0	0	0	
May-21	0	0	0	
Jun-21	0	0	0	
Jul-21	0	0	0	
Aug-21	0	0	0	
Sep-21	0	0	0	
Oct-21	0	0	0	
Nov-21	0	0	0	
Dec-21	0	0	0	
Jan-22	0	1	0	
Feb-22	0	0	0	
Mar-22	0	0	0	

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# **Street and Outdoor Lighting Conversion**

Street and Outdoor Lighting Conversion Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	6,540	0	
Feb-21	0	1,834	0	
Mar-21	0	10,023	0	
Apr-21	0	1,429	0	
May-21	0	10,736	0	
Jun-21	0	3,408	0	
Jul-21	0	5,600	0	
Aug-21	0	16,382	0	
Sep-21	0	4,510	0	
Oct-21	0	105	0	
Nov-21	0	6,384	0	
Dec-21	0	2,280	0	
Jan-22	0	961	0	
Feb-22	0	6,531	0	
Mar-22	0	1,710	0	

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# **Lighting Conditioned Space**

Lighting Conditioned Space Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	1	0	
Feb-21	0	5	0	
Mar-21	0	32	0	
Apr-21	0	11	0	
May-21	0	17	0	
Jun-21	0	11	0	
Jul-21	0	14	0	
Aug-21	0	8	0	
Sep-21	0	7	0	
Oct-21	0	10	0	
Nov-21	0	13	0	
Dec-21	0	14	0	
Jan-22	0	11	0	
Feb-22	0	7	0	
Mar-22	0	4	0	

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# **Lighting Non-Conditioned Space**

Lighting Non-Conditioned Space Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	9	0
Feb-21	0	2	0
Mar-21	0	28	0
Apr-21	0	10	0
May-21	0	13	0
Jun-21	0	7	0
Jul-21	0	9	0
Aug-21	0	2	0
Sep-21	0	2	0
Oct-21	0	5	0
Nov-21	0	9	0
Dec-21	0	5	0
Jan-22	0	14	0
Feb-22	0	6	0
Mar-22	0	3	0

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# **Lighting Occupancy Sensors**

Lighting Occupancy Sensors Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	0	0
Feb-21	0	0	0
Mar-21	0	1	0
Apr-21	0	0	0
May-21	0	0	0
Jun-21	0	0	0
Jul-21	0	0	0
Aug-21	0	0	0
Sep-21	0	1	0
Oct-21	0	0	0
Nov-21	0	1	0
Dec-21	0	1	0
Jan-22	0	1	0
Feb-22	0	0	0
Mar-22	0	0	0

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## **Commercial Load Management (GSLM 1)**

Commercial Load Management (GSLM 1)  Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	0	0
Feb-21	0	0	0
Mar-21	0	0	0
Apr-21	0	0	0
May-21	0	0	0
Jun-21	0	0	0
Jul-21	0	0	0
Aug-21	0	0	0
Sep-21	0	0	0
Oct-21	0	0	0
Nov-21	0	0	0
Dec-21	0	0	0
Jan-22	0	0	0
Feb-22	0	0	0
Mar-22	0	0	0

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#### **Commercial Smart Thermostats**

Commercial Smart Thermostats Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	0	0	
Feb-21	0	0	0	
Mar-21	0	0	0	
Apr-21	0	0	0	
May-21	0	0	0	
Jun-21	0	0	0	
Jul-21	0	1	0	
Aug-21	0	1	0	
Sep-21	0	0	0	
Oct-21	0	0	0	
Nov-21	0	0	0	
Dec-21	0	0	0	
Jan-22	0	0	0	
Feb-22	0	0	0	
Mar-22	0	0	0	

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### **Standby Generator**

Standby Generator Wait List and Participation Details			
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants
Jan-21	0	0	0
Feb-21	0	2	0
Mar-21	0	1	0
Apr-21	0	0	0
May-21	0	0	0
Jun-21	0	0	0
Jul-21	0	0	0
Aug-21	0	0	0
Sep-21	0	0	0
Oct-21	0	3	0
Nov-21	0	0	0
Dec-21	0	0	0
Jan-22	0	0	0
Feb-22	0	0	0
Mar-22	0	2	0

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### **Variable Frequency Drive Control for Compressors**

Variable Frequency Drive Control for Compressors Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	0	0	
Feb-21	0	0	0	
Mar-21	0	0	0	
Apr-21	0	0	0	
May-21	0	1	0	
Jun-21	0	0	0	
Jul-21	0	0	0	
Aug-21	0	0	0	
Sep-21	0	0	0	
Oct-21	0	0	0	
Nov-21	0	0	0	
Dec-21	0	0	0	
Jan-22	0	0	0	
Feb-22	0	0	0	
Mar-22	0	0	0	

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# **Commercial Water Heating**

Commercial Water Heating Wait List and Participation Details				
Period	Program Offered or Suspended (mark "O" or "S")	Number of Program Participants	Number of Wait-Listed Participants	
Jan-21	0	0	0	
Feb-21	0	0	0	
Mar-21	0	0	0	
Apr-21	0	0	0	
May-21	0	0	0	
Jun-21	0	0	0	
Jul-21	0	0	0	
Aug-21	0	0	0	
Sep-21	0	0	0	
Oct-21	0	0	0	
Nov-21	0	0	0	
Dec-21	0	0	0	
Jan-22	0	0	0	
Feb-22	0	0	0	
Mar-22	0	0	0	

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- **6.** In 2021, what was the Company's System Average Line Loss percentage?
- **A.** The company's system average line loss values used in DSM are as follows:
  - Residential:

Power (kW): 7.3 percentEnergy (kWh): 5.6 percent

• Commercial/Industrial

kW: 7.0 percent kWh: 5.2 percent

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- 7. Describe how supply chain interruptions, if any, impacted the Company in offering conservation programs in 2021. Please identify each program that had notable supply chain challenges and describe the responsive actions TECO took to mitigate these challenges.
- A. Tampa Electric did not experience any notable supply chain interruptions in the performance of facilitating the company's Commission approved DSM programs.

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- 8. On Page 3 of the Report, TECO provides information reflecting that the Utility Cost per Installation of the Residential Alternative Audit (a/k/a Walk-Thru Audit) program in 2021 was \$2,165. On Page 4, the same information for the Residential Customer Assisted Audits program is provided, reflecting that the Utility Cost per Installation of the Residential Customer Assisted Audit program was \$6 in 2021.
  - A. Please explain the differences between the two programs (the Residential Alternative Audit and the Residential Customer Assisted Audit programs) in order to support the reported Utility Cost per Installation amounts.
  - B. The Net Benefits of Measures Installed in 2021 for the Residential Alternative Audit (a/k/a Walk-Thru Audit) was (\$1,789,000). The similar metric for the Residential Customer Assisted Audit programs was \$384,600. Please explain the variance between the Net Benefits of Measures Installed values shown for each respective program.
  - C. Please provide the calculation to support the (\$1,789,000) amount.
  - D. Please provide the calculation to support the \$384,600 amount.
- A. a. Residential Walk-Through Audit (Free Energy Check): is a conservation program adopted by Florida under Chapter 366.82(5), Florida Statutes, and Rule 25-17.003 F.A.C. This program is offered to all residential customers and is designed to save demand and energy by increasing customer awareness of energy use in personal residences. Savings are dependent on the customer implementing energy saving recommendations.

The audit is conducted by a trained and certified residential energy analyst who will perform the following at a minimum:

- 1. Identify, note and recommend those conservation measures and practices that apply to the specific residence.
- 2. Encourage customer participation in available conservation programs in which the specific residence and customer will benefit.
- 3. Identify and communicate to the customer identified no-cost, low-cost conservation measures and practices including those that have less than a two-year payback.

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Residential Customer Assisted Energy Audit (Online): is a conservation program designed to save demand and energy by increasing residential customer awareness of energy use in personal residences. This program allows for residential customers to engage in the energy audit either through a phone call or completing an online energy questionnaire. Savings are dependent on the customer implementing energy conservation measure and practice recommendations. Recommendations are standardized and include an estimated range of savings.

To access this free audit, customers can either call or go to Tampa Electric's internet site to link to the audit. Customers will answer questions about their home and energy usage. Personalized audit results are either emailed, provided by the phone team or immediately displayed on the customer's computer for review and implementation. The audit recommendations are based on the customers' answers to the questions and their actual energy consumption.

Utility Cost per Participant Explanation: The cost of each of the residential energy audit programs on a per participant basis is calculated by dividing the programs actual cost for the year by the amount of participation in that program. The reason why the per participant cost of the Residential Walk-Through Audit (Free Energy Check) is higher than the estimated value provided in the company's 2020-2029 DSM Plan of \$161 is that the COVID-19 pandemic prevented Tampa Electric from performing non-essential face-to-face (on-site) and in-home interactions for the safety of the company's customers, employees and contractors. The company was able to accomplish some walk-through energy audits in customer's homes when the company returned to normal operations on November 8, 2021. It is important to note that even though these Team members focused their time on assisting customers via other methods such as phone audits or assisting customers in general with energy usage questions, they continued charging their time to the walk-through energy audit program because, as the company saw in 2020 and 2021, the date to resume normal operations has been a moving target since the start of the COVID-19 Pandemic. The per participant cost of the Residential Customer Assisted Energy Audit (Online) is much lower than the estimated value of \$36 that was provided in the company's 2020-2029 DSM Plan. This lower value is due to the great

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number of Tampa Electric's customers that are taking advantage of this quality online energy audit program.

- b. The Net Benefits of Measures for the Residential Walk-Through Audit (Free Energy Check) and the Residential Customer Assisted Energy Audit (Online) programs are developed during the development of the company's most recent DSM Plan. The Rate Impact Measure ("RIM") test Net Benefits values were found to be (1,613) for the Residential Walk-Through Audit (Free Energy Check) and 58 for the Residential Customer Assisted Energy Audit (Online).
- c. The total Net Benefits for the Residential Walk-Through Audit (Free Energy Check) program is calculated by multiplying the Net Benefits by the number of actual cumulative number of program participants in that DSM Plan divided by the adjusted cumulative projected program participants for that year. For 2021, the calculation would be the following:
  - = (1,613) \* 37,709 cumulative participants / 38,000 projected participants

= (1,600,648)

Note: in the calculation of these net benefits, Tampa Electric identified a formula that did not carry over from the preceding year. This formula issue occurred on all of the individual program pages and only affected the total net benefits calculation. The company will refile all of the individual pages and will provide an updated excel spreadsheet with the formula corrected.

- d. The total Net Benefits for the Residential Customer Assisted Energy Audit (Online) program is calculated by multiplying the Net Benefits by the number of actual cumulative number of program participants in that DSM Plan divided by the adjusted cumulative projected program participants for that year. For 2021, the calculation would be the following:
  - = 58,000 \* 215,494 cumulative participants / 62,500 projected participants
  - = \$199.978

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Note: in the calculation of these net benefits, Tampa Electric identified a formula that did not carry over from the preceding year. This formula issue occurred on all of the individual program pages and only affected the total net benefits calculation. The company will refile all of the individual pages and will provide an update excel spreadsheet with the formula corrected.

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- 9. On Bates Stamp Page 4 of the Company's 2021 DSM Annual Report, TECO provided information on its Residential Customer Assisted audit program. The report indicates that in 2021, the actual number of participants in this program grew compared 2020, and also exceeded the Company's projected participation for 2021. Please describe the Company's assessment for why participation in this program grew compared 2020, and also exceeded projections for 2021.
- A. There are two main reasons why the company exceeded the projected 2021 participation in the Residential Customer Assisted Audit (Online Audit). The first reason was, during the time in-home field activity was suspended due to the COVID-19 Pandemic, Tampa Electric increased marketing efforts for the Customer Assisted Audit (Online Audit) as a way to provide customers with beneficial tips and recommendations on how to conserve energy until the company resumed normal operations. These marketing efforts included the following:
  - Promotional pop-up message when logging into the Tampa Electric company website portal
  - Posts on social media sites with a call-to-action button to complete the Customer Assisted Audit (including Facebook, Twitter, Instagram, etc.)
  - Energy Analyst videos promoting the Customer Assisted Audit were shared on social media (including Facebook, Twitter, Instagram, etc.)
  - Marketing material on bills for both printed bill and e-bill customers
  - Radio advertising
  - Television advertising through the Customer Assisted Audit commercial

The second reason is the online energy audit tool that is provided to customers is a quality online tool for residential energy management. From the inception of this online energy auditing tool being implemented, the company has experienced significant participation in this DSM program.

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- **10.** On Bates Stamp Page 15 of the Company's 2021 DSM Annual Report, the actual number of program participants in the Energy Planner program was lower than the number the Company projected for this program.
  - A. Identify the specific reasons why this program did not achieve the projected participation levels for 2021.
  - B. What, if any, program modifications is the Company considering or researching to ensure that this program will be able to more closely achieve projected participation levels? Please explain.
- A. a. The main reason why the Energy Planner program has lower participation than projected in 2021 is due to the COVID-19 Pandemic which prevented Tampa Electric from performing non-essential face-to-face (on-site) and in-home interactions for the safety of the company's customers, employees and contractors. In 2021, this restriction was in place from January 1, 2021, through November 8, 2021. During this time, the company developed a waiting list for customers wanting to participate in the program.
  - b. The company is not recommending any modifications to the Energy Planner program at this time to ensure that this program will be able to more closely achieve projected participation levels. Due to the COVID-19 Pandemic, the waitlist described above had 1,112 participants waiting to come onto the Energy Planner Program. When the company resumed normal operations on November 8, 2021, the company focused on trouble work that had also built a backlog since the restrictions went into place. The trouble work was completed near the beginning of 2022 and the company transitioned to performing installations from the waitlist. At the time of this filing the waitlist has grown to 1,266 new installations that are waiting. This number of customers on the waitlist and new customers that will ask to participate during the year will greatly exceed the number of annual participants the company projected in its 2020-2029 DSM Plan.

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- 11. On Bates Stamp Page 27 of the Company's 2021 DSM Annual Report, the Company provided information on its Commercial Street and Outdoor Lighting Conversion program. The report indicates that in 2021, the actual number of participants in this program grew compared 2020, and also exceeded the Company's projected participation for 2021. Please describe the Company's assessment for why participation in this program grew compared 2020, and also exceeded projections for 2021.
- A. In 2020, the company converted 25,469 non-Light Emitting Diode ("LED") luminaires to LED. The reason 2021 exceeded the company's projection is due to a workflow reconciliation issue which caused lights that were converted prior to 2021, to be delayed in reporting until 2021. This issue in the delay of reporting has been corrected from occurring again. The company is projecting to complete the remaining LED conversions by 2023.

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**12.** Pursuant to Rule 25.17.0021(5)(k), Florida Administrative Code, FPUC's Report shall contain, at a minimum, "a justification for variances larger than 15% for the annual goals established by the Commission." Please state the justification in 2021 for the variance larger than 15% for TECO's Residential Winter Demand Reduction (MW) goal.

A. The reason the company was unable to achieve the annual Residential and combined Winter Demand reduction goals was due to Tampa Electric's suspending non-essential operations due to the COVID-19 Pandemic which prevented the company from performing non-essential face-to-face (on-site) and in-home interactions for the safety of the company's customers, employees, and contractors. In 2021, this restriction was in place from January 1, 2021, through November 8, 2021, which was similar to 2020. In 2020, the restrictions due to COVID-19 were in place from March 16, 2020, through the end of the 2020 year.