



Stephanie A. Cuello  
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December 16, 2022

**VIA ELECTRONIC FILING**

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

Re: *Proposed Amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities;*  
Docket No. 20200181

Dear Mr. Teitzman:

On behalf of Duke Energy Florida, LLC ("DEF"), please find enclosed for electronic filing in the above-referenced Docket, DEF's Post Workshop Comments.

Thank you for your assistance in this matter and if you have any questions, please feel free to contact me at (850) 521-1425.

Sincerely,

*s/ Stephanie A. Cuello*

Stephanie A. Cuello

SAC/ts  
Attachment

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

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Docket No. 20200181-EI

Filed: December 16, 2022

**POST-WORKSHOP COMMENTS FROM DUKE ENERGY FLORIDA, LLC**

Duke Energy Florida, LLC (“DEF”), recognizes the value of demand-side management (“DSM”). Recently the Florida Public Service Commission (“Commission”) Staff hosted another Rulemaking Workshop on November 30, 2022. DEF offers the following post workshop comments for Commission consideration.

First and foremost, DEF appreciates the Commission’s interest and Commission Staff’s efforts to update and modernize the Florida Energy Efficiency and Conservation Act (“FEECA”) rules, as well as this opportunity to provide the following input:

- DSM Goals and the associated DSM Program Plans are the key outputs of an important and meaningful process so that Florida utilities can both assist their customers to use energy more efficiently and reduce the utilities’ needs for future traditional supply-side investments. It is essential that the process yield meaningful and balanced DSM Goals and DSM Programs which do not over or under emphasize cost-effectiveness from any single perspective, as well as potentially broaden consideration to include additional customer perspectives.
- Any changes to the process used to determine DSM Goals should appropriately reflect the economic circumstances of different customers in the determination of free ridership and cost-effectiveness, thereby allowing utilities to propose and provide transparency around meaningful and adequately funded energy-efficiency and demand-response offerings designed to assist low-income customers.

- DEF believes that the proposed rule amendment provided by Commission Staff will provide greater transparency around different potential outcomes of the proven objective process and provide the Commission with additional flexibility to make potential modifications permitted under FEECA. These updated rules will allow utilities and the Commission to develop DSM Goals and DSM Programs that appropriately balance costs and benefits.

DEF appreciates the opportunity to provide these comments and respectfully reserve the right to provide additional comments pending review of comments or changes to the proposed rule filed by the other parties.