



January 13, 2023

VIA: ELECTRONIC FILING

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

Re: Petition of Tampa Electric Company for Proposed Amendment of Rule 25-17.0021, F.A.C.,
Goals for Electric Utilities
Docket No. 20200181-EI

Dear Mr. Teitzman:

Attached please find Tampa Electric Company's Response to Staff's First SERC Data Request (Nos. 1-18), propounded by email on December 22, 2022.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Malcolm N. Means'.


Malcolm N. Means

MNM/bml
Attachments

cc: All parties of record
Sevini Guffey (sguffey@psc.state.fl.us)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Tampa Electric Company's Response to Staff's First SERC Data Request (Nos. 1-18), filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 13th day of January 2023 to the following:

<p>JEA Mr. Berdell Knowles 21 West Church Street Jacksonville, FL 32202 knowl@jea.com</p> <p>Advanced Energy Economy Michael Weiss/Kim Jemaine 1000 Vermont Ave., NW 3rd Floor Washington, DC 20005 kjemaine@aee.net mweiss@aee.net</p> <p>Joint Administrative Procedures Committee Ken Plante, Coordinator 680 Pepper Bldg. 111 W. Madison Street Tallahassee, FL 32399 Joint.admin.procedure@leg.state.fl.us</p> <p>Peoples Gas Systems Paula K. Brown P.O. Box 111 Tampa, FL 33601 regdept.tecoenergy.com</p> <p>Orlando Utilities Commission Mr. W. Christopher Browder P.O. Box 3193 Orlando, FL 32802 cbrowder@ouc.com</p> <p>Net-Plus Solar Power Group Achim Ginsberg-Klemmt achim@srqus.com</p>	<p>Office of Public Counsel Patty Christensen/Richard Gentry c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 Christensen.patty@leg.state.fl.us Gentry.richard@leg.state.fl.us</p> <p>Southern Alliance for Clean Energy George Cavros 120 E. Oakland Park Blvd. Ft. Lauderdale, FL 33334 George@cleanenergy.org</p> <p>Katie Chiles Ottenweller Vote Solar 151 Estoria Street SE Atlanta GA 30316 katie@votesolar.org</p> <p>Cindy Miller LLC Cindy Miller 1544 Cristobal Drive Tallahassee, FL 32301 milcindy@gmail.com</p> <p>Rhonda Roff marshmaid@gmail.com</p> <p>Environmental Confederation of Southwest Florida; and League of United Latin American Citizens of Florida Bradley Marshall/Jordan Luebke 111 S. Martin Luther King Jr. Blvd. Tallahassee, FL 32301 bmarshall@earthjustice.org jluebke@earthjustice.org</p> <p style="text-align: center;"> _____ ATTORNEY</p>
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**TAMPA ELECTRIC COMPANY
DOCKET NO. 20200181-EI
STAFF'S FIRST DATA REQUEST
REQUEST NO. 1
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- 1.** Draft revision to Rule 25-17.0021(2), F.A.C., states that each utility must file a technical potential study that must be used to develop the proposed demand-side-management (DSM) goals for major end-use categories of residential and commercial/industrial market segments. Please provide your utility's incremental five-year cost estimate to perform this task.
- A.** Tampa Electric projects no additional incremental costs required to perform this task.

Tampa Electric historically has a new technical potential study developed every five years, or refreshes the last technical potential study that was performed, to support the development of the company's proposed demand side management ("DSM") goals.

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- 2.** Please explain how and to what extent your utility's practice under the draft revision to Rule 25-17.0021(2), F.A.C., regarding conducting and filing a technical potential study, would be materially different from your utility's current implementation of the existing rule. In your response, please identify the relevant activities implemented by your utility in recent goal setting proceedings.
- A.** Tampa Electric does not believe there will be any material differences in the company's practice under the revised version of Rule 25-17.0021(2), F.A.C. as compared to the utility's practice under the existing rule.

Tampa Electric and the other Florida Energy Efficiency and Conservation Act ("FEECA") utilities did make one change in their development of the technical potential study that is currently underway. Specifically, the companies initiated development of the technical potential study earlier to allow for the development of the supporting DSM programs based upon the Rate Impact Measure Test ("RIM") and the Total Resource Cost Test ("TRC") to now occur concurrently with the proposed DSM goals filing. Historically, the companies developed programs after the DSM goals were approved by the Commission.

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- 3.** Draft revisions to Rule 25-17.0021(2), F.A.C., states that “[t]he technical potential study must . . . assess the full technical potential of all available demand-side conservation and efficiency measures, including demand-side renewable systems, associated with” specific Major End-Use Categories in Residential and Commercial/Industrial Market Segments. Compare the draft revision to the treatment of Residential and Commercial/Industrial Market Segments found in the current Rule 25-17.0021(3), F.A.C., and explain how and to what extent your utility’s practice under the draft revision would be materially different from your utility’s implementation under the existing rule.
- A.** Tampa Electric believes that the draft revision to Rule 25-17.0021(2), F.A.C. will not result in any material differences to the company’s practices as compared to the current implementation of the existing rule.

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4. Please identify your utility's incremental five-year cost to implement draft revisions found in Rule 25-17.0021(2)(a)-(q), F.A.C., compared to the existing Rule 25-17.0021(3)(a)-(u), F.A.C. In particular, detail the incremental five-year cost resulting from the addition of the "Lighting Efficiencies" category to the Residential Market Segment and the removal of "Renewable/Natural Gas substitutes for electricity" and "Other," categories from both Residential and Commercial/Industrial Market Segments.
 - A. Tampa Electric projects no additional incremental costs required to implement draft revisions found in Rule 25-17.0021(2)(a)-(q), F.A.C., compared to the existing Rule 25-17.0021(3)(a)-(u), F.A.C.

Tampa Electric historically has a new technical potential study developed every five years, or refreshes the last technical potential study that was performed, to support the development of the company's proposed DSM goals. This process has always involved the introduction of new technologies and elimination of some existing technologies based on the results of the study.

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- 5.** Draft revision to Rule 25-17.0021(2), F.A.C., (page 2, lines 19-21) states that the technical potential study must describe how the DSM goals were developed, including identifying measures that were analyzed but excluded from consideration. Please provide the estimated incremental five-year cost to your utility to perform this task.
- A.** Tampa Electric projects no additional incremental costs required to describe how the DSM goals were developed, including identifying measures that were analyzed but excluded from consideration.

Tampa Electric historically provides this information in testimony which describes the process of developing the company's proposed DSM goals in addition to providing the measure lists that identify the measures that were analyzed and either included or excluded from consideration. The company has no current plans to change this historical process.

Tampa Electric historically has a new technical potential study developed every five years, or refreshes the last technical potential study that was performed, to support the development of the company's proposed DSM goals. This process has always involved the introduction of new technologies and elimination of some existing technologies based on the results of the study.

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- 6.** Please explain how and to what extent your utility's implementation under the draft revision to Rule 25-17.0021(2), F.A.C., (page 2, lines 19-21) as described in question five above, is materially different from your utility's current implementation of the existing rule. In your response, please identify the relevant activities implemented by your utility in recent goal setting proceedings.
- A.** Tampa Electric believes that the practice of describing how the DSM goals were developed, including identifying measures that were analyzed but excluded from consideration, as described in question five above, will not have any material differences under the draft revision to Rule 25-17.0021(2), F.A.C. as compared to the current implementation of the existing rule.

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7. Draft revision to Rule 25-17.0021(3), F.A.C., states that each utility must file its DSM goals developed under two scenarios: (1) Participant and Rate Impact Measure Tests and (2) Participant and Total Resource Cost Tests. What is the estimated incremental five-year cost to your utility to prepare and submit the two stated scenarios?
 - A. Tampa Electric projects no additional incremental costs required to prepare and submit DSM goals developed under two scenarios: (1) Participant Cost Test ("PCT") and RIM and (2) PCT and TRC.

As stated in Response No.1 above, the timing of this development is being shifted to earlier in the overall process of DSM goals and DSM Plan development.

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- 8.** Draft revision to Rule 25-17.0021(3), F.A.C., (page 3, lines 16-18) requires the utility to provide the overall estimated annual program cost over a ten-year period “for each potential demand-side management program identified in the proposed goals and in each scenario described above.” What is the estimated incremental five-year cost to your utility to implement this requirement?
 - A.** Tampa Electric projects no additional incremental costs required to provide the overall estimated annual program cost over a ten-year period “for each potential demand-side management program identified in the proposed goals and in each scenario described in question seven above”.

As stated in Response No.1 above, the timing of this development is being shifted to earlier in the overall process of DSM goals and DSM Plan development.

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- 9.** Please explain how and to what extent your utility's implementation of the draft revisions to Rule 25-17.0021(3), F.A.C., described above in question eight, is materially different from your utility's current implementation of the existing rule. In your response, please identify the relevant activities implemented by your utility in recent goal setting proceedings.
- A.** As stated in Response No.1 above, the timing of this development is being shifted to earlier in the overall process of DSM goals and DSM Plan development.

Tampa Electric historically would develop the achievable potential to support the proposed DSM goals. In this development, the cost over the ten-year period "for each potential DSM measure" that survived cost-effectiveness would be developed and identified in the proposed goals. These proposed DSM goals would include a PCT and RIM scenario and a PCT and TRC scenario. These proposed DSM goals would only be based upon cost-effective measures.

Once the DSM goals were approved by the Commission, the company would develop a proposed DSM Plan for the Commission. This process involved evaluating individual measures, as well as coupled measures, to develop DSM programs. The company would then screen each program for cost-effectiveness (with the exception of low-income programs and energy audits). Finally, the company would estimate program participation and the overall estimated program cost over a ten-year period and would provide this information in the proposed DSM Plan submitted for Commission approval.

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- 10.** Draft revision to Rule 25-17.0021(4), F.A.C., states that each utility must file its DSM plan that includes the programs to meet the goals, along with program administrative standards that include a statement of the policies and procedures detailing the operations and administration of each program. What is the estimated incremental five-year cost to your utility to file the DSM program administrative standards?
 - A.** Tampa Electric projects no additional incremental costs required to file its DSM plan that includes the programs to meet the goals, along with program administrative standards that include a statement of the policies and procedures detailing the operations and administration of each program.

Tampa Electric historically develops the program administrative standards that includes a statement of the policies and procedures detailing the operations and administration of each program at the same time it developed its proposed DSM Plan. Once the Commission approved the DSM Plan, the company would then file the program for administrative approval from Commission Staff.

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- 11.** Please explain how and to what extent your utility's implementation of the draft revision to Rule 25-17.0021(4), F.A.C., as described in question ten, is materially different from your utility's implementation of the existing rule.
 - A.** As explained in response to Data Request No. 10 above, Tampa Electric believes that there will be no material differences from the company's implementation of the current rule, other than timing.

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12. Referring to the draft subsection (4)(j), what is the estimated five-year cost to your utility to prepare an estimate of the annual amount to be recovered through the energy conservation cost recovery clause for each calendar year in the planning horizon?

A. Tampa Electric projects no additional incremental costs over the next five years to prepare the overall estimated annual program cost over the ten-year DSM plan period. The process to develop the annual clause amount over the ten-year planning horizon will be the same as under the current rule.

Tampa Electric projects the process of cost estimation during the process of DSM goals and DSM Plan development to cost less than ten thousand dollars over the five-year period. Again, this will not be materially different than the cost under the current rule.

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- 13.** Do you believe the draft revisions to Rule 25-17.0021, F.A.C., will have incremental negative impacts to small businesses, small cities, and counties within your service territory? If yes, please provide an explanation.
- A.** No. The company does not believe that the draft revisions to Rule 25-17.0021, F.A.C will have any incremental negative impacts to any customer class or business segment within the company's service area.

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- 14.** Considering above draft's requirements and their associated costs, would the draft rule increase regulatory costs, including transactional costs (such as filing fees, license fees, equipment needed, additional operating costs, monitoring and reporting costs, and other associated costs) to your utility in excess of \$200,000 in the aggregate within one year after implementing the rule? Additionally, what is the currently estimated cost compared to recent goal setting proceedings' costs?
- A.** No. Tampa Electric believes the draft revisions to Rule 25-17.0021, F.A.C as compared to the current implementation of the existing rule will result in very little, if any, incremental costs. As stated in Response No.1 above, the timing of this development is being shifted to earlier in the overall process of DSM goals and DSM Plan development.

Tampa Electric's overall estimated cost to develop DSM goals in the last DSM goals proceeding was approximately \$300,000 over a 30-month period of time. Tampa Electric projects the current overall estimated costs to be about the same with the draft revisions to Rule 25-17.0021, F.A.C as compared to the current implementation of the existing rule.

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- 15.** Do you believe the draft revisions to Rule 25-17.0021, F.A.C., will have incremental adverse impacts on economic growth, private sector investment and job creation, business competitiveness, productivity, and innovations? If yes, please provide an explanation.
- A.** No. The company does not believe that the draft revisions to Rule 25-17.0021, F.A.C will have incremental adverse impacts on economic growth, private sector investment and job creation, business competitiveness, productivity, and innovations.

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- 16.** Would your utility's compliance with the draft revised rule, have an incremental effect on the state or local (service area of utility) revenues? If yes, please provide estimated revenues and an explanation.
- A.** No. The company does not believe that the draft revisions to Rule 25-17.0021, F.A.C for Tampa Electric's compliance, will have an incremental effect on the state or local (service area of utility) revenues.

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- 17.** Please provide additional information regarding these draft rule revisions, which the Commission may determine useful.
- A.** As stated in the Workshops, Tampa Electric supports the Commission Staff's proposed changes to Rule 25-17.0021 and agrees that the changes will add more clarity and transparency to the goal setting process.

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- 18.** Would there be any additional potential incremental costs or savings to your utility, not already detailed in response to the questions above, resulting from updated implementation practices if the draft rule revisions are adopted? Please provide an estimated savings amount with an explanation.
- A.** Tampa Electric is always striving to find opportunities to reduce costs by streamlining DSM operations. At this time, the company does not have any suggestions for updated implementation practices if the draft rule revisions are adopted. The company does conduct post process critiques after each major DSM filing which will identify activities which were done well, along with those activities which needed improvement to lower the costs eventually asked for recovery through the Energy Conservation Cost Recovery Clause ("ECCR").