

January 13, 2023

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Docket No. 20200181-EU

Subject: JEA Responses to the Florida Public Service Commission's Statement of Estimated Regulatory Costs (SERC) data request issued December 22, 2022

Enclosed please find JEA's Responses to the Florida Public Service Commission's Statement of Estimated Regulatory Costs (SERC) data request issued December 22, 2022. The responses are being submitted by nFront Consulting LLC on behalf of JEA.

If you have any questions about this submittal, please do not hesitate to contact me.

Respectfully submitted,

/s/ 

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Please see below for JEA's responses to the Florida Public Service Commission's *Statement of Estimated Regulatory Costs (SERC)* data request issued December 22, 2022 issued pursuant to Docket No. 2020181-EU.

Consistent with the definition of "incremental" as stated in the subject data request, for purposes of JEA's responses:

"incremental" means the net change anticipated as necessary to comply with the draft amended version of the rule. In other words, practices and costs under the current version of the rule should be compared to anticipated practices and costs under the draft amended rule, and the difference between the two is considered "incremental."

- 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.**

JEA Response:

JEA does not anticipate an incremental five-year cost difference to file a technical potential study between the existing and proposed rule.

- 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.**

JEA Response:

JEA does not anticipate an incremental material change regarding conducting and filing a technical potential study under the proposed rule as compared to under the existing rule.

- 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.**

JEA Response:

JEA does not anticipate a materially different practice regarding conducting and filing a technical potential study under the proposed rule as compared to under the existing rule.

- 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.**

JEA Response:

JEA does not anticipate an incremental five-year cost difference between the existing and proposed rule.

- 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.**

JEA Response:

JEA does not anticipate an incremental five-year cost difference associated with the technical potential study between the existing and proposed rule.

- 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.**

JEA Response:

JEA does not anticipate any materially different practice regarding conducting and filing a technical potential study under the proposed rule as compared to under the existing rule.

- 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?**

JEA Response:

JEA does not anticipate an incremental five-year cost difference to prepare and submit the two stated scenarios under the proposed rule.

- 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?**

JEA Response:

JEA does not anticipate an incremental five-year cost difference to provide the overall estimated annual program cost over a ten-year period between the existing and proposed rule.

- 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.**

JEA Response:

JEA does not anticipate any materially different implementation plan regarding conducting and filing a technical potential study under the proposed rule as compared to under the existing rule.

- 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?**

JEA Response:

JEA does not anticipate an incremental five-year cost difference for filing the DSM program administrative standards between the existing and proposed rule.

- 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.**

JEA Response:

JEA does not anticipate any materially different implementation plan regarding conducting

and filing a technical potential study under the proposed rule as compared to under the existing rule.

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?

JEA Response:

JEA does not anticipate an incremental five-year cost difference related to preparing an estimate of the annual amount to be recovered through the energy conservation cost recovery clause between the existing and proposed rule. As a municipal utility, the energy conservation cost recovery clause is not applicable to JEA.

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.

JEA Response:

No. JEA does not anticipate that the draft revisions to Rule 25-17.0021, F.A.C. will have incremental negative impacts to small businesses, small cities, and counties within JEA's service territory.

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?

JEA Response:

No. JEA does not anticipate an incremental cost difference for such regulatory costs between the existing and proposed rule.

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.

JEA Response:

No. JEA does not anticipate that the draft revisions to Rule 25-17.0021, F.A.C. will have incremental adverse impacts to economic growth, private sector investment, job creation,

business competitiveness, productivity, or innovation.

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.

JEA Response:

No. JEA does not believe that compliance with the draft revised rule will have an incremental effect on the state or local revenues.

17) Please provide additional information regarding these draft rule revisions, which the Commission may determine useful.

JEA Response:

JEA does not have any additional information in this regard.

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.

JEA Response:

JEA does not anticipate an incremental cost difference between the existing and proposed rule.