

DOCKET NO. 20230121-EG

FILED 10/16/2023
DOCUMENT NO. 05698-2023
FPSC - COMMISSION CLERK

Writer's Direct Dial Number: (850) 521-1706
Writer's E-Mail Address: bkeating@gunster.com

October 16, 2023

BY E-PORTAL

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

Re: [New Filing]: Petition of the Associated Gas Distributors of Florida (AGDF) for Approval of Conservation Demonstration and Development Program.

Dear Mr. Teitzman:

Attached for filing, please find a Petition for Approval of a Conservation Demonstration and Development Program, submitted on behalf of the Associated Gas Distributors of Florida, which is submitting this Petition on behalf of its member gas utilities, except for Peoples Gas System.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

MEK

cc:/ (PSC General Counsel)
(Office of Public Counsel)
(Division of Economics)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Associated Gas Distributors of Florida,) Docket No.:
Inc. for Approval of a Conservation Demonstration)
and Development Program.) Filed: October 16, 2023
)

**PETITION FOR APPROVAL OF CONSERVATION DEMONSTRATION AND
DEVELOPMENT PROGRAM**

In accordance with Rules 25-17.009 and 28-106.201, Florida Administrative Code, the Associated Gas Distributors of Florida, Inc. ("AGDF" or "Petitioner"), by and through its undersigned counsel, hereby petitions the Florida Public Service Commission ("Commission") on behalf of its members for approval to reinstate a Conservation Demonstration and Development Programs ("CDD Program") for the AGDF members. In support of this Petition, AGDF states:

1. The exact name and address of the principal office of the Petitioner is as follows:

Associated Gas Distributors of Florida
P.O. Box 11026
Tallahassee, Florida 32302

2. Notices and communications with respect to this petition and docket should be addressed to the following:

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706
bkeating@gunster.com

B. Dale Calhoun, Executive Director
Associated Gas Distributors of Florida
P.O. Box 11026
Tallahassee, Florida 32302
(850) 681-0496 office
dale@floridagas.org

3. AGDF is a trade association representing the following investor-owned natural gas utilities, all of which are subject to the jurisdiction of the Florida Public Service Commission under Chapter 366, Florida Statutes. The members represented by AGDF are Florida City Gas ("City Gas"), Florida Public Utilities Company ("FPUC-NG") which incorporates the former affiliates Florida Public Utilities Company – Indiantown Division, Florida Public Utilities Company – Fort Meade, and the Florida Division of Chesapeake Utilities Corporation d/b/a Central Florida Gas, Peoples Gas System ("Peoples Gas"), Sebring Gas System ("Sebring") and St. Joe Natural Gas Company ("St. Joe") (herein generally referred to as the "LDCs").
4. AGDF is organized as a Florida Not-For-Profit corporation representing the collective interests of its members both before the Federal Energy Regulatory Commission ("FERC") and the Commission. In recent years, the AGDF has worked to develop a series of demand side management programs, including a residential conservation program, a temporary conservation demonstration and development program, and most recently, a commercial conservation program.¹ AGDF has led, and continues to lead, the industry's efforts in consumer education activities throughout the state and assists with the coordination of members' efforts in this regard.
5. This petition is being filed by AGDF on behalf of its members, with the exception of Peoples Gas System², each of whom would otherwise have standing in their own right to bring a similar petition (hereinafter "participating members"). Furthermore, the relief

¹ See, Orders Nos. PSC-10-OI13-PAA-EG, issued in Docket No. 090122-EG; PSC-I0-0551-PAA-EG, issued in Docket No. 100186-EG; and PSC-14-0039-PAA-EG, as amended, issued in Docket No. 130167-EG, and Order No. PSC-15-0095-PAA-EG, issued in Docket No. 20140196-EG.

² Peoples Gas System has a recently approved Conservation Research and Development Program, which was approved by Order No. PSC-2021-0242-PAA-EG, issued July 2, 2021, in Docket No. 20190210-EG.

requested is consistent with and germane to the AGDF's organizational purpose. Standing for AGDF to file this petition is therefore appropriate pursuant to Rosenzweig v. Department of Transportation, 979 So. 2d 1050 (Fla. 1st DCA 2008), and Farm Worker Rights Organization, Inc. v. Dept. of Health and Rehabilitative Services, 417 So.2d 753, (Fla. 1st DCA 1982).³ Moreover, this petition replaces multiple, separate petitions, which should facilitate the review process and contribute to administrative efficiencies.

6. The substantial interests of the participating members of AGDF will be impacted by the Commission's decision on this request in that it will determine whether the proposed conservation program is consistent with the Commission's rules and therefore eligible for cost recovery.
7. AGDF is not aware of any disputed facts associated with its request set forth herein.
8. The Commission is the appropriate agency for consideration of AGDF's request and is authorized to take action by the Florida Energy Efficiency and Conservation Act ("FEECA"), §§ 366.80-366.83 and 403., Florida Statutes, and in accordance with Rules 25-17.009 and 17.015, Florida Administrative Code.
9. The purpose of this petition is to seek approval for the AGDF members to include a new Conservation Demonstration & Development Program ("CDD") similar to the temporary CDD program approved by the Commission in Docket No. 20090122-EG, and thereafter extended through 2017 consistent with Order No. PSC-15-0095-PAA-EG, issued in Docket No. 20140196-EG. As AGDF has noted in the past, the member LDCs have found that working collaboratively on statewide initiatives to promote energy efficiency and

³ See also, Hunt v. Washington State Apple Adver. Comm'n, 432 U.S. 333 (1977)(setting forth a three prong test for associational standing); and Florida Home Builders Association vs. Department of Labor and Security, 412 So.2d 351 (Fla. 1982)(determining that a trade association had standing to initiate a rule challenge).

energy conservation initiatives has been beneficial to both AGDF member utilities and their respective customers. This was the case with the CDD program in the past, as the joint funding of initiatives tends to lessen the financial burden on individual LDCs, while providing participating member utilities the opportunity to pursue initiatives independently.

10. As the Commission has recognized, it has historically supported reasonable research and development activities for electric utilities and has likewise recognized that the provisions of Rule 25-17.001(5)(f), Florida Administrative Code, which encourage the aggressive pursuit of research, development and demonstration projects, should also generally apply to natural gas utilities.⁴ The Commission has also found that coordinated research efforts of the AGDF member LDCs can lead to economic efficiencies.⁵

A. BACKGROUND

11. By Order No. PSC-2010-0113-PAA-EG, issued February 25, 2010, in Docket No. 090122-EG, the Commission approved the AGDF's request for approval of the CDD Program on behalf of its member companies. The Commission determined that the CDD Program will enable the LDCs " ... to pursue opportunities for individual and joint research and development of new natural gas conservation programs." Order at p. 4. The Commission determined that the CDD Program met the Commission's historic tests set forth in Order No. 22176 for evaluating such programs.⁶ In approving the CDD Program, the Commission also accepted the AGDF's proposal for a five (5)-year cap ("Cap") on expenditures under the program, as well as individual project caps. Consistent with the Order, the CDD Cap

⁴ See, Order No. PSC-2015-0095-PAA-EG, at page 4, citing Order No. PSC-10-0113-PAA-EG.

⁵ Id.

⁶ Order No. 22176, issued November 14, 1989, in Docket No. 890737-PU.

date is March 25, 2015, five years from the effective date of the CDD Program.

12. Thereafter, in view of the approaching date for capping the CDD program, the AGDF sought Commission approval to extend the Cap to December 31, 2017, an extension of a little more than 2.5 years.

13. By Order No. PSC-2015-0095-PAA-EG, issued in Docket No. 20140196-EG, the Commission approved the requested extension. In doing so, however, the Commission made modifications to the program to address three concerns: 1. the financial impact of the extended program, particularly upon smaller LDC members; 2. the ambitious nature of the number of programs proposed for consideration during the limited time frame; and 3. the lack of a strategic objective for AGDF's research plan and unclear nexus between the plan and conservation efforts.⁷ AGDF was, therefore, directed by the Commission to prioritize its intended research efforts on those projects with the most potential benefit to the LDCs' customers with respect to conservation actions and to file a final status report within six months following the project close date of December 31, 2017. Consistent with this requirement, AGDF filed its CDD Activity Report on June 28, 2018, in Dockets Nos. 20180004-GU and 20140196-EG.

B. UPDATED CONSERVATION PROGRAM

14. In the intervening years since the expiration of the CDD program, the AGDF members have had an opportunity to consider the benefits of implementation of a permanent program. During this time, new technologies and resource opportunities have also become more prevalent, suggesting that revisiting the CDD on a more permanent basis could lead

⁷ Order No. PSC-2015-0095-PAA-EG at page 5.

to the realization of meaningful conservation benefits for the customers of the participating AGDF members. Consistent with FEECA, reinstatement of a CDD program on a permanent basis would enable the participating AGDF members to better investigate new technologies and resources on a more cost-effective basis, namely new technologies that can conserve natural gas, increase the overall efficiency and cost-effective use of natural gas, and/or implement renewable energy sources⁸ that can address a piece of our complex energy supply puzzle.⁹ In that regard, as previously noted, the Commission has previously indicated that Rule 25-17.001(5)(f), Florida Administrative Code, which encourages the aggressive pursuit of research, development and demonstration projects, should generally apply to natural gas utilities, and that coordinated research efforts of the AGDF member LDCs can lead to economic efficiencies.¹⁰

15. While the proposed demonstration development program is intended to identify new gas energy conservation measures, it will also serve a critical role in enhancing and updating *existing* gas conservation programs. Many of the existing gas conservation programs that are administered by AGDF utilities require updating to reflect various energy and cost assumptions that change over time. This CDD program would allow funding to complete the analysis required to file updated conservation programs, most notably, the cost-effectiveness data inputs that are required for gas conservation program approval.

16. A permanent conservation demonstration development program is necessary for AGDF utilities to be able to better bridge the knowledge gap in assessing the viability of

⁸ Renewable natural gas is now specifically included within the definition of “renewable energy” for purposes of Florida’s renewable energy policy, as set forth in ss. 366.91 and 366.92, F.S.

⁹ See, s. 366.81, F.S.

¹⁰ *Supra*, fn 4.

one of the following three scenarios are met. First, the proposed conservation measure or program must have an effect on rate paying customers. Second, there is currently insufficient data and/or research on the conservation measure or program being evaluated. And third, there is insufficient Florida-specific data on the conservation program or measure being evaluated.

19. After the minimum eligibility requirements have been met, the proposed CDD funding project would then have to comport with one of the following three CDD Categories, *Efficiency*, *Resiliency*, or *Renewable*. **Efficiency Category** would include CDD research projects that focused on appliance efficiency and would include demonstration projects that seek to measure the efficiency and cost effectiveness of emerging gas end-use equipment and technologies when installed in Florida. **Resiliency Category** would include CDD research projects that focus on smaller, on-site, backup electric generation technologies for home and commercial use that are fueled by gas and are configured as either a standalone or as a combined heat power configuration. **Renewable Category** would include CDD research efforts intended to identify and encourage the proliferation of customer-owned renewable natural gas opportunities among commercial and industrial customers all across the state. See Appendix A to this Petition for specific anticipated projects under the above-referenced categories.

20. Many of the anticipated projects in the first category, **Efficiency**, will involve updated reviews of equipment that is already the subject of AGDF member conservation programs, while projects in this category will also look at entirely new technologies for residential and commercial use. Projects in this category will pursue technologies that involve the efficient combustion of natural gas, as well as efficiencies, including the conservation of

the fuel itself, that can be gained through the incorporation of smart-devices, sensors, and automatic-reporting functionality. As for **Resiliency**, projects in this category will investigate the feasibility of programs built around newer natural gas back-up generation equipment that is projected to use less fuel and to function with greater overall efficiency than older, more commonly used equipment. The new and emerging technologies and systems reviewed in this category will typically be those that have already undergone laboratory testing and are awaiting field testing. As for the final category, **Renewable**, AGDF proposes to investigate the nexus between the use of renewable fuels and the achievement of conservation targets. Overall, the projects will be specifically designed to determine whether the programs and technologies analyzed have the technical potential to actually “. . . increase the conservation of expensive resources, such as petroleum fuels, to reduce and control the growth rates of electric consumption, to reduce the growth rates of weather-sensitive peak demand, and to encourage development of demand-side renewable energy resources.” s. 366.82(2), F.S.

21. CDD project funding participation standards have been developed to establish criteria for approving funding for proposed CDD Projects. Appendix B contains the CDD Funding Request Form.
22. Each participating AGDF LDC will report any CDD-related expenses and participation on this program through the company’s annual conservation cost recovery clause expense review. A summary table is provided below to illustrate the annual, estimated CDD expenses in total, as well as the proposed program expense limits for each LDC, based upon the assumptions that one (1), two (2), or three (3) CDD projects will be conducted per year.

LDC	One (1) CDD Project	Two (2) CDD Projects	Three (3) CDD Projects
FPU NG	\$75,000.00	\$150,000.00	\$225,000.00
FCG	\$75,000.00	\$150,000.00	\$225,000.00
St. Joe	\$5,000.00	\$10,000.00	\$15,000.00
Sebring	\$2,000.00	\$4,000.00	\$6,000.00

23. The expected ECCR impacts to Residential customers assuming one (1), two (2), or three (3) CDD projects per year is detailed in Appendix C and summarized in the table below:

Baseline Scenario with Assumptions from(Docket 2023004)													
Baseline				ECCR Impacts from One (1) CDD Project			ECCR Impacts from Two (2) CDD Projects			ECCR Impacts from Three (3) CDD Projects			
	Rate	Annual Therms	ECCR Revenues	Current ECCR	Incremental Cost + ECCR Revenues	New ECCR	Increase (%)	Cost + ECCR Revenues	New ECCR	Increase (%)	I Cost + ECCR	New ECCR	Increase (%)
FPU NG (Res. 1)	1,702,286	\$ 220,778	\$ 0.12970	\$ 226,044	0.13279	2.39%	\$ 231,310	\$ 0.13588	4.77%	236,576	\$ 0.13898	7.16%	
FPU NG (Res. 2)	6,029,806	\$ 399,379	\$ 0.06623	\$ 418,032	0.06933	4.67%	\$ 436,686	\$ 0.07242	9.34%	455,339	\$ 0.07551	14.01%	
FPU NG (Res. 3)	16,512,023	\$ 600,451	\$ 0.03636	\$ 651,532	0.03946	8.51%	\$ 702,612	\$ 0.04255	17.01%	753,693	\$ 0.04565	25.52%	
FCG (RS-1)	2,419,596	\$ 709,833	\$ 0.29337	\$ 720,171	0.29764	1.46%	\$ 730,508	\$ 0.30191	2.91%	740,846	\$ 0.30619	4.37%	
FCG (RS-100)	13,792,206	\$ 1,947,603	\$ 0.14121	\$ 2,006,530	0.14548	3.03%	\$ 2,065,458	\$ 0.14976	6.05%	2,124,385	\$ 0.15403	9.08%	
FCG (RS-600)	1,342,285	\$ 113,818	\$ 0.08479	\$ 119,553	0.08907	5.04%	\$ 125,288	\$ 0.09334	10.08%	131,023	\$ 0.09761	15.12%	
Sebring (TS-1)	56,844	\$ 7,344	\$ 0.12920	\$ 9,344	0.16438	27.23%	\$ 11,344	\$ 0.19956	54.47%	13,344	\$ 0.23475	81.70%	
St. Joe (RS-1)	97,695	\$ 32,974	\$ 0.33752	\$ 34,070	0.34874	3.32%	\$ 35,166	\$ 0.35996	6.65%	36,262	\$ 0.37118	9.97%	
St. Joe (RS-2)	167,700	\$ 40,128	\$ 0.23928	\$ 42,010	0.25050	4.69%	\$ 43,891	\$ 0.26172	9.38%	45,773	\$ 0.27294	14.07%	
St. Joe (RS-3)	180,237	\$ 32,567	\$ 0.18069	\$ 34,589	0.19191	6.21%	\$ 36,612	\$ 0.20313	12.42%	38,634	\$ 0.21435	18.63%	

* LDC ECCR cost figures sourced from Docket No. 2023004 August

D. CONCLUSION

24. The gas conservation CDD program proposed by AGDF in this petition meets the Commission's historic tests for evaluating such programs and further the policy objectives of FEECA. Commission approval of a new, revamped, permanent CDD program for the participating AGDF members is also consistent with the Commission’s historic support of research, demonstration, and development programs for both electric and natural gas utilities.

25. AGDF notes that approval of the CDD program for each of the petitioning AGDF members, as proposed herein, will not have any impact on the Energy Conservation Cost

Recovery Factors (“ECCR Factors”) approved for the participating LDCs for 2023, as set forth in Order No. PSC-2022-0423-FOF-GU, issued December 14, 2022. Any necessary adjustments will be included in the individual LDC filings for ECCR Factors for 2024, unless the Commission instructs otherwise.

WHEREFORE, the Associated Gas Distributors of Florida, Inc. respectfully requests that the Commission enter its order granting this Petition and approve the proposed Conservation Demonstration and Development program for the participating AGDF members as described herein.

RESPECTFULLY SUBMITTED this 16th day of October, 2023.

By: 
Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

Attorneys for AGDF

Appendix A

I. Efficiency

Objective: Evaluate technologies that improve the efficiency of existing end-use gas equipment.

- A. Residential:
 - 1. Watering Heating systems
 - 2. Condensing Furnaces and Hydronic Heating systems
 - 3. Cooking and Clothes Drying appliances
 - 4. Pool heating technologies and approaches
 - 5. Residential Gas Fired Heat pumps
- B. Commercial:
 - 1. Multi-Family Central Heating, Cooling and WH systems
 - 2. Commercial Food Sector Appliances
 - 3. Commercial Water Heating Systems
 - 4. Rooftop Mounted Gas Heat Pumps

II. Resiliency

Objective: Evaluate new natural gas distributed generation technologies that increase a building's resiliency, while providing enhanced efficiency over traditional technologies.

- A. Residential:
 - 1. Backup Generator systems
 - 2. Large Home/Small Scale CHP systems
 - 3. Microgrid configurations
 - 4. Residential Fuel cell power systems & applications
- B. Commercial:
 - 1. Backup Generator systems
 - 2. Large Scale CHP Systems
 - 3. Fuel cell power systems & applications

III. Renewable

Objective: Evaluate technologies and opportunities for the cost-effective use renewable natural gas over traditionally-sourced natural gas by pairing traditional gas technologies with RNG in order to conserve traditionally produced natural gas, employ a Florida renewable fuel source and reduce overall methane emissions:

- A. RNG technical potential (commercial, agricultural, industrial)
- B. Solar Assisted Hybrid Gas WH Systems (FSEC/GTI)
- C. Hydrogen technical potential (Blending, appliances, production)
- D. Other ideas (Power to Gas technical potential, Thermo-Electric)

CDD Project Funding Request Submittal Form

CDD Project: (*Sample*)

8/2/2023

OVERVIEW

A please provide a brief explanation of what prompted this CDD funding opportunity:

GOALS

Please list the goals of this CDD funding opportunity and the organizations involved:

SPECIFICATIONS

Please specify the scope of research associated with this CDD funding opportunity:

BUDGET & TIMELINE

Please provide the expected timeline, the annual cost per year, and total project cost:

UTILITY APPROVAL

_____ (Utility Rep. Title) _____ (Signature)

Baseline Scenario with Assumptions from (Docket 2023004)				APPENDIX C										
Baseline				ECCR Impacts from One (1) CDD Project			ECCR Impacts from Two (2) CDD Projects			ECCR Impacts from Three (3) CDD Projects			LDC Allocation % to Each Residential Rate Class	
	Rate	Annual Therms	ECCR Revenues	Current ECCR	Incremental Cost + ECCR Revenues	New EECCR	Increase (%)	Incremental Cost + ECCR Revenues	New EECCR	Increase (%)	Cost + ECCR Revenues	New EECCR		
FPU NG (Res. 1)	1,702,286	\$ 220,778	\$ 0.12970	\$ 226,044	0.13279	2.39%	\$ 231,310	0.13588	4.77%	236,576	0.13898	7.16%	24,244,115	7.0%
FPU NG (Res. 2)	6,029,806	\$ 399,379	\$ 0.06623	\$ 418,032	0.06933	4.67%	\$ 436,686	0.07242	9.34%	455,339	0.07551	14.01%		24.9%
FPU NG (Res. 3)	16,512,023	\$ 600,451	\$ 0.03636	\$ 651,532	0.03946	8.51%	\$ 702,612	0.04255	17.01%	753,693	0.04565	25.52%		68.1%
FCG (RS-1)	2,419,596	\$ 709,833	\$ 0.29337	\$ 720,171	0.29764	1.46%	\$ 730,508	0.30191	2.91%	740,846	0.30619	4.37%	17,554,087	13.8%
FCG (RS-100)	13,792,206	\$ 1,947,603	\$ 0.14121	\$ 2,006,530	0.14548	3.03%	\$ 2,065,458	0.14976	6.05%	2,124,385	0.15403	9.08%		78.6%
FCG (RS-600)	1,342,285	\$ 113,818	\$ 0.08479	\$ 119,553	0.08907	5.04%	\$ 125,288	0.09334	10.08%	131,023	0.09761	15.12%		7.6%
Sebring (TS-1)	56,844	\$ 7,344	\$ 0.12920	\$ 9,344	0.16438	27.23%	\$ 11,344	0.19956	54.47%	13,344	0.23475	81.70%	56,844	
St. Joe (RS-1)	97,695	\$ 32,974	\$ 0.33752	\$ 34,070	0.34874	3.32%	\$ 35,166	0.35996	6.65%	36,262	0.37118	9.97%	445,632	22%
St. Joe (RS-2)	167,700	\$ 40,128	\$ 0.23928	\$ 42,010	0.25050	4.69%	\$ 43,891	0.26172	9.38%	45,773	0.27294	14.07%		38%
St. Joe (RS-3)	180,237	\$ 32,567	\$ 0.18069	\$ 34,589	0.19191	6.21%	\$ 36,612	0.20313	12.42%	38,634	0.21435	18.63%		40%

* LDC ECCR cost figures sourced from Docket No. 2023004 August

Baseline Scenario with Assumptions from(Docket 2022004)

Baseline		ECCR Impacts from One (1) CDD Project			ECCR Impacts from Two (2) CDD Projects			ECCR Impacts from Three (3) CDD Projects				
Rate	Annual Therms	ECCR Revenues	Current ECCR	Incremental Cost + ECCR Revenues	New ECCR	Increase (%)	Incremental Cost + ECCR Revenues	New ECCR	Increase (%)	Cost + ECCR Revenues	New ECCR	Increase (%)
FPUC & Ft. Meade (RS)	16,356,660	\$ 1,440,715	\$ 0.08808	\$ 1,504,330	0.09197	4.42%	\$ 1,567,946	\$ 0.09586	8.83%	1,631,561	\$ 0.09975	13.25%
FPUC - Indiantown (TS-1)	100,249	\$ 9,442	\$ 0.09419	\$ 9,832	0.09807	4.13%	\$ 10,222	\$ 0.10196	8.26%	10,612	\$ 0.10585	12.39%
FPUC - CFC (FTS-1)	2,826,956	\$ 404,152	\$ 0.14296	\$ 415,147	0.14685	2.72%	\$ 426,142	\$ 0.15074	5.44%	437,136	\$ 0.15463	8.16%
FCG (RS-1)	2,637,817	\$ 672,298	\$ 0.25487	\$ 683,293	0.25904	1.64%	\$ 696,393	\$ 0.26400	3.58%	708,440	\$ 0.26857	5.38%
FCG (RS-100)	13,783,570	\$ 2,303,398	\$ 0.16711	\$ 2,366,351	0.17168	2.73%	\$ 2,429,303	\$ 0.17625	5.47%	2,492,256	\$ 0.18081	8.20%
Sebring (TS-1)	52,893	\$ 6,416	\$ 0.12130	\$ 8,416	0.15911	31.17%	\$ 10,416	\$ 0.19693	62.34%	12,416	\$ 0.23474	93.52%
St. Joe (RS-1)	105,346	\$ 28,567	\$ 0.27117	\$ 29,725	0.28216	4.05%	\$ 30,882	\$ 0.29315	8.10%	32,040	\$ 0.30414	12.16%
St. Joe (RS-2)	169,992	\$ 32,302	\$ 0.19002	\$ 34,170	0.20101	5.78%	\$ 36,038	\$ 0.21200	11.57%	37,906	\$ 0.22299	17.35%
St. Joe (RS-3)	179,668	\$ 26,549	\$ 0.14777	\$ 28,523	0.15876	7.44%	\$ 30,498	\$ 0.16974	14.87%	32,472	\$ 0.18073	22.31%

* LDC ECCR cost figures sourced from Docket No. 2022004 August

Baseline Scenario with Assumptions from Docket 08890-2021				ECCR Impacts from One (1) CDD Project			ECCR Impacts from Two (2) CDD Projects			ECCR Impacts from Three (3) CDD Projects			LDC Allocation % to Each Residential Rate Class	
Rate	Annual Therms	ECCR Revenues	Current ECCR	Incremental Cost + ECCR Revenues	New EECCR	Increase (%)	Incremental Cost + ECCR Revenues	New EECCR	Increase (%)	Incremental Cost + ECCR Revenues	New EECCR	Increase (%)		
FPUC & Ft. Meade (RS)	15,992,936	\$ 1,372,740	\$ 0.08583	\$ 1,436,835	0.08984	4.67%	\$ 1,500,931	\$ 0.09385	9.34%	1,565,026	\$ 0.09786	14.01%	18,713,806	85.5%
FPUC - Indiantown (TS-1)	117,230	\$ 9,792	\$ 0.08353	\$ 10,262	0.08754	4.80%	\$ 10,732	\$ 0.09154	9.60%	11,201	\$ 0.09555	14.39%		0.6%
FPUC - CFC (FTS-1)	2,603,640	\$ 378,927	\$ 0.14554	\$ 389,362	0.14955	2.75%	\$ 399,796	\$ 0.15355	5.51%	410,231	\$ 0.15756	8.26%		13.9%
FCG (RS-1)	2,957,930	\$ 795,333	\$ 0.26888	\$ 805,768	0.27241	1.31%	\$ 822,545	\$ 0.27808	3.42%	836,151	\$ 0.28268	5.13%	16,304,787	18.1%
FCG (RS-100)	13,346,857	\$ 2,300,729	\$ 0.17238	\$ 2,362,123	0.17698	2.67%	\$ 2,423,517	\$ 0.18158	5.34%	2,484,911	\$ 0.18618	8.01%		81.9%
Sebring (TS-1)	49,957	\$ 10,373	\$ 0.20764	\$ 12,373	0.24767	19.28%	\$ 14,373	\$ 0.28771	38.56%	16,373	\$ 0.32774	57.84%	49,957	
St. Joe (RS-1)	93,043	\$ 31,937	\$ 0.34325	\$ 33,127	0.35604	3.73%	\$ 34,318	\$ 0.36884	7.45%	35,508	\$ 0.38163	11.18%	390,800	24%
St. Joe (RS-2)	145,869	\$ 34,172	\$ 0.23426	\$ 36,038	0.24706	5.46%	\$ 37,905	\$ 0.25985	10.92%	39,771	\$ 0.27265	16.38%		37%
St. Joe (RS-3)	151,888	\$ 28,156	\$ 0.18537	\$ 30,099	0.19817	6.90%	\$ 32,043	\$ 0.21096	13.80%	33,986	\$ 0.22376	20.71%		39%

* LDC ECCR cost figures sourced from Docket No. 08890-2021