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STATE OF FLORIDA



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# Public Service Commission

November 20, 2023

## STAFF'S FIRST DATA REQUEST

Beth Keating, Esquire  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301

Via E-Mail

### Re: Docket No. 20230121-EG – Petition of Associated Gas Distributors of Florida (AGDF) for Approval of Conservation Demonstration and Development Program

Dear Ms. Keating:

By this letter, the Commission staff respectfully requests AGDF provide responses to the following questions, regarding the above-referenced petition (petition).

1. Please refer to the petition, Paragraph 3, wherein the member utilities represented by AGDF are identified. Please answer the following:
  - A. If the petition is approved, is there any impediment for the Commission to issue an order for each participating utility, rather than a single order? If so, please discuss.
  - B. Please describe the role Peoples Gas, a member of AGDF but not a joint petitioner, or its employees, would have in any CDD project decisions that impact the joint petitioners.
  
2. Please refer to the petition, Paragraph 4, which includes a footnoted citation to Order No. PSC-10-0113-PAA-EG, issued February 25, 2010, in Docket No. 090122-EG (2010 Order). Please reference the 2010 Order and the petition to answer the following questions:
  - A. In the 2010 Order, separate programs were approved for each utility, including a program description, criteria, and eligible measures. Are company specific programs no longer being proposed in the current petition? If so, please discuss.

- B. In the 2010 Order, the approved programs allowed participation by the LDCs with entities other than AGDF. Is participation with these outside entities no longer being proposed in the current petition? If so, please discuss.
  - C. In the 2010 Order, the individual utilities were required to seek administrative approval from Commission staff prior to proceeding with a project. Is this administrative approval no longer being proposed in the current petition? If so, discuss the reason for the change in new project authorization.
  - D. Page 3 in the 2010 Order states that the (2010) CDD Program “could result in the . . . elimination of duplicate projects.” By utility, please list each instance that a duplicate project was eliminated since 2010.
  - E. Page 3 in the 2010 Order states that the (2010) CDD Program “could result in the . . . application of a screening method that would ensure priority ranking of potential projects.” Please provide any documents or other evidence that this was accomplished during the original 5-year timeframe referenced in the 2010 Order, or thereafter.
  - F. Page 3 in the 2010 Order states that the (2010) CDD Program “could result in . . . a guarantee a variety of [CDD] projects that could benefit AGDF member LDCs.” Please provide any documents or other evidence that this was accomplished during the original 5-year timeframe referenced in the 2010 Order, or thereafter.
  - G. Page 3 in the 2010 Order states that the (2010) CDD Program “could result in . . . a reduction of administrative costs if joint projects are pursued.” Please provide any documents or other evidence that this was accomplished during the original 5-year timeframe referenced in the 2010 Order, or thereafter.
  - H. Page 4 in the 2010 Order also referenced that a 5 year cap with single-year limits was established in the prior docket. Please explain why a similar structure was not requested in the instant docket.
3. Please refer to the petition, Paragraph 5, which states, in part, that [t]his petition is being filed by AGDF on behalf of its members . . . .”
- A. Assuming approval of the petition, please discuss AGDF’s role in approving/denying the CDD Funding Request Forms (as featured in Appendix B to the petition). Address in your response how forms are evaluated, including the

request process for conducting the criteria reviews and timetables for project request approvals.

- B. Assuming approval of the petition, please discuss AGDF's role for collecting and/or disbursing funds on behalf of its members for CDD programs. If applicable, address in your response how the role differs for shared programs.
  - C. Assuming approval of the petition, please discuss AGDF's role in selecting the vendors to conduct CDD projects on behalf of its members.
  - D. Assuming approval of the petition, please discuss whether any CDD projects will be performed by AGDF on behalf of its members (i.e. by vendors identified by AGDF), the members themselves, or either of these as determined by AGDF by project.
4. Please refer to the petition, Paragraph 9, which states, in part, that the petition seeks "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." In addition please refer to Appendix A of the petition.
- A. Please explain what is to be included in the new CDD program, by category as listed in Appendix A. Identify the specific project(s) the member utilities are considering, and provide all related details.
  - B. Paragraph 9 also discusses, the collaborative work on statewide initiatives that the LDCs have engaged in, and that it is found to be beneficial to both AGDF member utilities and their respective customers. However, the paragraph 22 table as well as Appendix B both appear to be for projects by the individual utilities rather than collaborative projects. Please explain how this DSM CDD program addresses cost allocation for collaborative work, given the aforementioned table and request form.
5. From the petition, Paragraph 13 references the CDD Activity Report dated June 28, 2018 (2018 Report). Please answer the following questions:

- A. The 2018 Report identified findings from Gas Heat Pump Field Tests. Please identify how those findings have been incorporated into the conservation programs each joint petitioner currently offers. Please provide a detailed response for each joint petitioner.
  - B. Please address how the findings of the 2018 Report related to the Gas Heat Pump Field Tests impacted the cost-effectiveness assessment of conservation programs each joint petitioner currently offers. Please provide a detailed response for each joint petitioner.
  - C. The 2018 Report identified findings from Oil Conserving Fryer Tests. Please identify how those findings have been incorporated into the conservation programs each joint petitioner currently offers. Please provide a detailed response for each joint petitioner.
  - D. Please address how the findings of the 2018 Report related to the Oil Conserving Fryer tests impacted the cost-effectiveness assessment of conservation programs each joint petitioner currently offers. Please provide a detailed response for each joint petitioner.
  - E. Provide a review of all CDD projects implemented from 2010 to date, excluding the Gas Heat Pump Field Test and Oil Conserving Fryer Tests, by the utilities. Include the name of the utility, name of the project, time periods, explanation of the project, scope of the research and any findings. If any such CDD project resulted in impacts to utility conservation programs, please identify such impacts to the program and ratepayers.
6. Please refer to the petition, Paragraph 15, which states that the proposed CDD program would allow funding to complete the cost effectiveness data inputs that are required for gas conservation program approval. Please provide example(s) of past CDD projects that yielded changes in data inputs subsequently used for gas conservation program approval, and summarize the details.
  7. Please refer to the petition, Paragraph 22, which states, in part, that participating utilities “will report any CDD-related expenses and participation on this program through the company’s annual conservation cost recovery clause expense review.” Assuming

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approval of the petition, how do the participating utilities plan to report the status of CDD programs and projects with the Commission and/or with customers, what details do they plan to report, and under what timeframes?

8. Please refer to the petition, Paragraph 22, to answer the following questions regarding the CDD project cost summary table. Paragraph 22 states, in part, “A summary table is provided below to illustrate the annual, estimated CDD expenses in total, as well as the proposed limits for each LDC.” Do the values displayed in the table represent both the estimated expenses and the proposed expense limit? If not, please list what the proposed expense limit is for each LDC.

Please file all responses electronically no later than December 15th, via the Commission’s website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk’s Office tab and Electronic Filing Web Form. Please contact me at [blang@psc.state.fl.us](mailto:blang@psc.state.fl.us) at (850) 413-6964 if you have any questions.

Thank you,

/s/Bailey Lang

Bailey Lang  
Public Utility Analyst

cc: Michael Barrett, Economist Supervisor  
Office of the Commission Clerk (Docket file for Docket No. 20230121-EG)