

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by Florida Power & Light)
Company for Rate Unification and for) DOCKET NO. 20210015-EI
Base Rate Increase) FILED: FEBRUARY 6, 2024
_____)

**FLORIDIANS AGAINST INCREASED RATES, INC.’S
MOTION TO REOPEN THE EVIDENTIARY RECORD**

Floridians Against Increased Rates, Inc. (“FAIR”), pursuant to Rule 28-106.204(1), Florida Administrative Code, hereby respectfully filed this Motion to Reopen the Evidentiary Record in this docket for the limited purpose described hereinbelow. In summary, consistent with the Florida Supreme Court’s decision in Floridians Against Increased Rates, Inc. v. Clark, 371 So. 3d 905 (Fla. 2023), which remanded this case to the Florida Public Service Commission (“Commission”) for further proceedings, FAIR requests that the Commission reopen the evidentiary record in this case to admit evidence addressing Florida Power & Light Company’s (“FPL”) performance pursuant to the Florida Energy Efficiency and Conservation Act (“FEECA”). Specifically, FAIR requests that the Commission reopen the evidentiary record in this case for the limited purpose of allowing FAIR to submit the Commission’s Annual Report on Activities Pursuant to the Florida Energy and Conservation Act for 2021 (the “FEECA Report”), included as Attachment A.

Procedural Background

On December 2, 2021, the Commission issued its Final Order Approving 2021 Stipulation and Settlement Agreement. In re: Petition for rate increase by Florida Power & Light Company, Docket No. 20210015-EI (Fla. Pub. Serv. Comm'n, Dec. 2, 2021) Order No. PSC-2021-0446-S-EI (the “Remanded Order”). FAIR timely appealed the Remanded Order; Florida Rising, Inc., the League of United Latin American Citizens (“LULAC”), and the Environmental Confederation of Southwest Florida (“ECOSWF”) also appealed the Remanded Order. On September 28, 2023, the Florida Supreme Court issued its opinion concerning the Remanded Order, in which the Court determined that the Remanded Order’s findings of fact and law were insufficient to enable the Court to review it, thus:

Accordingly, we remand this matter to the Commission for further proceedings consistent with our decision, including, if the Commission shall determine that the settlement agreement is in the public interest and fixes fair, just, and reasonable rates in light of the statutory factors, a consideration of the parties’ main disagreements reflected in the record. From the order we have, we cannot conclude that the Commission exercised its discretion in accordance with the standards that the Legislature has provided.

Floridians Against Increased Rates, Inc. v. Clark, 371 So. 3d at 914 (citations omitted). With respect to the presentation of additional evidence on remand, the Court concluded that:

Subject to any statutory requirements, the form of the proceedings on remand will be up to the Commission, including the decision whether to allow parties to present additional evidence.

Id.

In determining that the Remanded Order failed to include a reasoned explanation of the Commission’s public interest determination required for judicial review, the Court explained:

The Legislature has provided that the Commission, in “fixing fair, just, and reasonable rates for each customer class, . . . shall, to the extent practicable, consider the cost of providing service to the class, as well as the rate history, value of service, and experience of the public utility; the consumption and load characteristics of the various classes of customers; and public acceptance of rate structures.” § 366.06(1). The Commission “shall also consider the performance of each utility pursuant to [the Florida Energy Efficiency and Conservation Act] when establishing rates for those utilities over which the Commission has ratesetting authority.” § 366.82(10), Fla. Stat. (2021). A reasonably explained decision from the Commission must reflect that those factors have been considered to the extent practicable.

Id. at 912 (emphasis supplied).

The FEECA Report

The Florida Energy Efficiency and Conservation Act was adopted by the Florida Legislature in 1980. Section 366.81, Florida Statutes (the legislative findings and intent section of FEECA) provides:

The Legislature finds and declares that it is critical to utilize the most efficient and cost-effective demand-side renewable energy systems and conservation systems in order to protect the health, prosperity, and general welfare of the state and its citizens. Reduction in, and control of, the growth rates of electric consumption and of weather-sensitive peak demand are of particular importance.

Sections 366.82(2) and 366.82(6), Florida Statutes, require the Commission to adopt goals for certain electric utilities as defined in FEECA (the “FEECA utilities”), and to review the goals no less often than every five years. FPL is a FEECA utility and a public utility as defined in Section 366.06(2), Florida Statutes, over which the Commission has ratesetting authority pursuant to various provisions of Chapter 366, Florida Statutes.

Section 366.82(10), Florida Statutes, requires the Commission to obtain periodic reports from the FEECA utilities and to provide an annual report to the Florida Legislature and the Governor by March 1 of each year summarizing the goals that the Commission has adopted for each FEECA utility and the progress each utility has made toward achieving its goals. The FEECA Report that FAIR requests the Commission to include in the record of this proceeding is the annual report published in 2021 as required by Section 366.82(10), Florida Statutes. The Commission’s 2021 FEECA Report indicates that for 2020, FPL met 5 of its FEECA goals and failed to meet 4 of its 9 FEECA goals. (A copy of the Commission’s 2021

FEECA Report is attached to this motion.) For convenience, the link to this FEECA Report is as follows:

2021 FEECA Report - <https://www.floridapsc.com/pscfiles/website-files/PDF/Publications/Reports/ElectricGas/AnnualReport/2021.pdf> .

The Commission Should Reopen the Record in this Docket for Entry into Evidence of the FEECA Report

The Florida Supreme Court made clear that the Commission has discretion to allow the parties in this proceeding to present additional evidence in the proceedings on remand. See Floridians Against Increased Rates, Inc., 371 So. 3d at 914. The Court also made it clear that a “reasonably explained decision” from the Commission must reflect that the Commission considered FPL’s performance pursuant to FEECA. Id. at 912. FAIR respectfully suggests that to allow the Commission to make a fully informed and reasonably explained decision concerning FPL’s compliance with FEECA, the Commission must exercise its discretion to reopen the record to include the Commission’s 2021 FEECA Report as part of the evidentiary record in this proceeding. Accordingly, FAIR requests that the Commission reopen the record in this proceeding for the limited purpose of admitting the 2021 FEECA Report.

Conferral With Other Parties

Pursuant to Rule 28-106.204(3), Florida Administrative Code, undersigned counsel has conferred via electronic mail requests with the other parties in this docket and reports the parties' positions as follows: Florida Rising, LULAC, and ECOSWF support the motion; the Florida Retail Federation, Walmart, FIPUG, the Office of Public Counsel, the Florida Internet and Television Association, Inc., the Federal Executive Agencies, CLEO, and SACE take no position on the motion; Mrs. Larson does not oppose the motion; and FPL would oppose the motion.

Respectfully submitted this 6th day of February, 2024.

/s/Robert Scheffel Wright

Robert Scheffel Wright

schef@gbwlegal.com

John T. LaVia, III

jlavia@gbwlegal.com

Gardner, Bist, Bowden, Dee, LaVia,

Wright, Perry & Harper, P.A.

1300 Thomaswood Drive

Tallahassee, Florida 32308

Telephone (850) 385-0070

Facsimile (850) 385-5416

Attorneys for Floridians Against Increased Rates, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 6th day of February, 2024, to the following:

Florida Power & Light Company

Kenneth A. Hoffman
134 W. Jefferson Street
Tallahassee, FL 32301
(850) 521-3901
(850) 521-3939
ken.hoffmann@fpl.com
Represented By: Gulf Power Company

Florida Power & Light Company

John Burnett/Maria Moncada/
Christopher Wright
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 691-7101
(561) 691-7135
john.t.burnett@fpl.com
maria.moncada@fpl.com
christopher.wright@fpl.com
Represented By: Gulf Power
Company

Gulf Power Company (Pensacola)

Russell A. Badders
One Energy Place
Pensacola, FL 32520-0100
(850) 444-6550
Russell.Badders@nexteraenergy.com
Represents: Florida Power & Light
Company

Office of Public Counsel

Walter Trierweiler/Patricia A.
Christensen/Anastacia Pirrello
c/o The Florida Legislature
111 W. Madison St., Rm 812
Tallahassee FL 32399
(850) 488-9330
(850) 487-6419
christensen.patty@leg.state.fl.us
TRIERWEILER.WALT@leg.state.fl.us
PIRRELLO.ANASTACIA@leg.state.fl.us

AARP Florida

Zayne Smith
360 Central Ave., Suite 1750
Saint Petersburg, FL 33701
(850) 228-4243
zamith@aarp.org

Broward County

Jason Liechty
115 S. Andrews Ave., Room 329K
Fort Lauderdale, FL 33301
(954) 519-0313
JLIECHTY@broward.org

Earthjustice

Bradley Marshall/Jordan Luebke
111 S. Martin Luther King Jr. Blvd.
Tallahassee, FL 32301
(850) 681-0031
(850) 681-0020
bmarshall@earthjustice.org
jluebke@earthjustice.org
Represents: Florida Rising, Inc./League of
Latin American Citizens of Florida;
Environmental Confederation of
Southwest Florida, Inc.

Christina I. Reichert

Earthjustice
4500 Biscayne Blvd., Ste. 201 Miami,
FL 33137
creichert@earthjustice.org
flcaseupdates@earthjustice.org
Represents: Florida Rising,
Inc./League of Latin American
Citizens of Florida; Environmental
Confederation of Southwest Florida,
Inc.

Federal Executive Agencies

T. Jernigan/Maj. H. Buchanan/Capt. R.
Friedman/TSgt. A. Braxton/E. Payton/S.
Kirk
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403
(850) 283-6663
ebony.payton.ctr@us.af.mil
thomas.jernigan.3@us.af.mil
ULFSC.Tyndall@us.af.mil
holly.buchanan.1@us.af.mil
robert.friedman.5@us.af.mil
arnold.braxton@us.af.mil
scott.kirk@us.af.mil

Florida Consumer Action Network
Bill Newton
billn@fcan.org

Walmart, Inc.
2608 SE J Street
Bentonville, AR 72716
Represented by: Spilman Law Firm

Florida Rising, Inc.
10800 Biscayne Blvd., Suite 1050
Miami, FL 33161
Represented By: Earthjustice

Southern Alliance for Clean Energy
3804 Middlebrook Pike
Knoxville TN 37921
(865) 637-6055
(865) 524-4479
Represented By: Garner Law Firm

Vote Solar
Katie Chiles Ottenweller
838 Barton Woods Rd. NE
Atlanta, GA 30307
(706) 224-8017
katie@votesolar.org

The CLEO Institute Inc.
2103 Coral Way, 2nd Floor
Miami, FL 33145
(305) 450-4854
Represented By: Garner Law Firm

Florida Industrial Power Users Group
Jon C. Moyle, Jr./Karen A. Putnal
c/o Moyle Law Firm
118 North Gadsden Street
Tallahassee, FL 32301
(850) 681-3828
(850) 681-8788
jmoyle@moylelaw.com
kputnal@moylelaw.com
mqualls@moylelaw.com

League of United Latin American Citizens of Florida
6041 SW 159 CT
Miami, FL 33193
Represented By: Earthjustice

Daniel R. and Alexandria Larson
16933 W. Harlena Dr.
Loxahatchee FL 33470
Represented By: Nathan A. Skop

Nathan A. Skop
420 NW 50th Blvd.
Gainesville FL 32607
(561) 222-7455
n_skop@hotmail.com
Represents: Daniel R. and Alexandria Larson

Florida Retail Federation
227 South Adams St.
Tallahassee, FL 32301
(850) 222-4082
(850) 226-4082
Represented by: Stone Law Firm

Spilman Law Firm
Barry A. Naum
1100 Bent Creek Boulevard
Suite 101
Mechanicsburg, PA 17050
(717) 795-2742
(717) 795-2743
bnam@spilmanlaw.com
Represents: Walmart Inc.

Stone Law Firm
James Brew/Laura Baker/Joseph Briscar
1025 Thomas Jefferson St., NW, Ste. 800
West
Washington DC 20007
(202) 342-0800
(202) 342-0807
jbrew@smxblaw.com
lwb@smxblaw.com
jrb@smxblaw.com
Represents: Florida Retail Federation

Spilman Law Firm
Stephanie U. Eaton
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
(336) 631-1062
(336) 725-4476
seaton@spilmanlaw.com
Represents: Walmart Inc.

Environmental Confederation of Southwest Florida
421 Verna Road
Miami, FL 33193
Represented By: Earthjustice

Mintz Law Firm

T. Scott Thompson
555 12th Street NW, Suite 1100
Washington, DC 20004
(202) 434-7440
SThompson@mintz.com

Represents: Florida Internet and
Television Association, Inc.

Garner Law Firm

William C. Garner
3425 Bannerman Road
Unit 105, #414
Tallahassee, FL 32312
(850) 328-5478
bgarner@wcglawoffice.com

Represents: The CLEO Institute Inc.

**Florida Internet and Television
Association, Inc.**

246 East 6th Avenue, Suite 100
Tallahassee, FL 32303
Represented by: Berger Law Firm/ Mintz
Law Firm

Berger Law Firm

Floyd R. Self
313 North Monroe Street, Suite 301
Tallahassee, FL 32301
(850) 521-6727
fself@bergersingerman.com

Represents: Florida Internet and
Television Association, Inc.

/s/ Robert Scheffel Wright
ATTORNEY



FLORIDA
PUBLIC
SERVICE
COMMISSION

FEECA

Annual Report on Activities Pursuant to the Florida Energy Efficiency and Conservation Act

As Required by Sections 366.82(10), 377.703(2)(f), and 553.975, Florida Statutes

NOVEMBER 2021

Attachment A

Florida Public Service Commission

Annual Report on Activities Pursuant to The Florida Energy Efficiency and Conservation Act

As Required by Sections 366.82(10) and 377.703(2)(f), and 553.975, Florida Statutes

November 2021

Table of Contents

Tables and Figures	iii
List of Acronyms	v
Executive Summary	1
Purpose.....	1
Report Layout.....	2
2019 Goalsetting Proceeding.....	2
2020 Achievements and Related Program Costs.....	3
Conclusion.....	4
Section 1. Florida Energy Efficiency and Conservation Act	5
1.1 FEECA History and Implementation.....	5
1.2 FEECA’s Influence on the Florida Energy Market.....	6
1.3 Recovery of Conservation Expenditures.....	9
Section 2. DSM Goalsetting	11
2.1 DSM Program Cost-Effectiveness and Energy Savings.....	11
2.2 Summary of the 2019 Goalsetting Process for Peoples Gas.....	14
2.3 Impact of Outside Factors on FEECA Utility DSM Programs.....	15
Section 3. FEECA Utilities’ Goal Achievements	19
3.1 Assessing Goal Achievement.....	19
3.2 Program Impacts of COVID-19.....	22
3.3 Information on Audit Programs.....	25
3.4 Low-Income Programs.....	29
3.5 Investor-Owned Utility Research and Development Programs.....	31
Section 4. Conservation Cost Recovery	35
4.1 Electric IOU Cost Recovery.....	35
4.2 Natural Gas Cost Recovery.....	37
Section 5. Educating Florida’s Consumers on Conservation	40
5.1 Commission Consumer Education Outreach.....	40
5.2 Related Websites.....	42
Appendix A. 2020 FEECA Utility Conservation Programs	45
Appendix B. 2020 FEECA Utility Conservation Program Descriptions	51

Tables and Figures

Tables

1.	Energy Sales by Florida's Electric FEECA Utilities in 2020.....	6
2.	Florida's Electric Customers by Class and Consumption in 2020	7
3.	Statewide Cumulative Demand and Energy Savings (Through 2020)	9
4.	Summary of Electric Cost-Effectiveness Methodologies	11
5.	Cumulative Commission-Approved Electric DSM Goals, 2015-2024.....	13
6.	Commission-Approved DSM Goals for PGS, 2019-2028.....	15
7.	Electric DSM Goals Compared to Annual (2020) Achievements	21
8.	PGS DSM Goals Compared to Annual (2020) Achievements	22
9.	Residential Audits by Type in 2020.....	26
10.	Commercial / Industrial Audits by Type in 2020	28
11.	DSM Expenditures Recovered by IOUs	35
12.	Residential Energy Conservation Cost Recovery Factors in 2022	36
13.	DSM Expenditures Recovered by LDCs	37
14.	Residential Natural Gas Conservation Cost Recovery Factors in 2022	39

Figures

1.	Typical Florida Daily Electric Load Shapes.....	7
2.	Demand-Side Renewable Energy Systems.....	14
3.	Residential Audits in 2019 and 2020	27
4.	Commercial / Industrial Audits in 2019 and 2020.....	28
5.	DSM Expenditures Recovered by Electric IOUs.....	36
6.	DSM Expenditures Recovered by LDCs	38

List of Acronyms

C/I	Commercial and Industrial (Customers)
Commission or FPSC	Florida Public Service Commission
COVID-19	Coronavirus Disease of 2019
CUC	Chesapeake Utilities Corporation
DEF	Duke Energy Florida, LLC
DOE	U.S. Department of Energy
DSM	Demand-Side Management
ECCR	Energy Conservation Cost Recovery
EV	Electric Vehicle
F.A.C.	Florida Administrative Code
FCG	Florida City Gas
FEECA	Florida Energy Efficiency and Conservation Act
FLBC	Florida Building Code
FPL	Florida Power & Light Company
FPUC	Florida Public Utilities Company
FRCC	Florida Reliability Coordinating Council
F.S.	Florida Statutes
GPR	Gross Power Rating
GRIM	Gas Rate Impact Measure Test
Gulf	Gulf Power Company
GWh	Gigawatt-Hour
HVAC	Heating, Ventilation, and Air Conditioning
IGC	Indiantown Gas Company
IOU	Investor-Owned Utility
JEA	Formerly known as Jacksonville Electric Authority
kWh	Kilowatt-Hour
LDC	Natural Gas Local Distribution Company
MMBtu	One Million British Thermal Units
MW	Megawatt
MWh	Megawatt-Hour
NGCCR	Natural Gas Conservation Cost Recovery
OUC	Orlando Utilities Commission
O&M	Operations and Maintenance
PV	Photovoltaic
PGS	Peoples Gas System
RIM	Rate Impact Measure Test
SGS	Sebring Gas System
SJNG	St. Joe Natural Gas
TECO	Tampa Electric Company
TRC	Total Resource Cost Test

Executive Summary

Purpose

Reducing the growth of Florida’s peak electric demand and energy consumption became a statutory objective in 1980, with the enactment of the Florida Energy Efficiency and Conservation Act (FEECA). FEECA emphasizes four key areas: reducing the growth rates of weather-sensitive peak demand and electricity usage, increasing the efficiency of the production and use of electricity and natural gas, encouraging demand-side renewable energy systems, and conserving expensive resources, particularly petroleum fuels. Sections 366.82(2) and 366.82(6), Florida Statutes (F.S.), require the Florida Public Service Commission (FPSC or Commission) to establish goals for the FEECA utilities and review the goals every five years, at minimum. The utilities are required to develop cost-effective demand-side management (DSM) plans that meet those goals and submit them to the Commission for approval.

Energy conservation and DSM in Florida are accomplished through a multi-pronged approach that includes energy efficiency requirements in building codes for new construction, federal appliance efficiency standards, utility programs, and energy education efforts. Utility programs, which are paid for by all customers, are aimed at increasing efficiency levels above building codes and appliance efficiency standards.

The Commission is required by Section 366.82(10), F.S., to provide an annual report to the Florida Legislature and the Governor summarizing the adopted goals and the progress made toward achieving those goals. Similarly, Section 377.703(2)(f), F.S., requires the Commission to file information on electricity and natural gas energy conservation programs with the Department of Agriculture and Consumer Services. Pursuant to Section 366.82(10), F.S., this report on conservation results achieved by the FEECA utilities is due to the Florida Legislature and Governor by March 1, 2022. This report reviews the 2020 annual goal results for each of the FEECA utilities and fulfills these statutory obligations.

The seven electric utilities and single natural gas utility currently subject to FEECA are listed below in order of sales:

Electric Investor-Owned Utilities	Municipal Electric Utilities
<ul style="list-style-type: none">• Florida Power & Light Company (FPL)• Duke Energy Florida, LLC (DEF)• Tampa Electric Company (TECO)• Gulf Power Company (Gulf)• Florida Public Utilities Company (FPUC)	<ul style="list-style-type: none">• JEA• Orlando Utilities Commission (OUC)
	Investor-Owned Natural Gas Local Distribution Company (LDC)
	<ul style="list-style-type: none">• Peoples Gas System (PGS)

The Commission regulates the rates and conservation cost recovery of the five electric IOUs and the single FEECA natural gas LDC. The Commission does not regulate the rates or conservation program costs of the two municipal electric utilities for which it sets DSM goals.

Report Layout

This report presents the FEECA utilities' progress towards achieving the Commission-established goals and the Commission's efforts in overseeing these conservation initiatives. This report details these efforts through the following five sections and appendices:

- Section 1 provides a brief history of FEECA and a description of existing tools for increasing conservation throughout the State of Florida.
- Section 2 discusses the DSM goalsetting process and the most recent Commission-established goals set for the FEECA utilities.
- Section 3 reviews the utilities' goal achievements, program impacts of COVID-19, and information on audit, low-income, and research and development programs.
- Section 4 provides an overview of the associated 2020 DSM program costs recovered through the Energy Conservation Cost Recovery (ECCR) Clause (as applies to electric IOUs) and Natural Gas Conservation Cost Recovery (NGCCR) Clause (as applies to LDCs).
- Section 5 discusses methods the Commission has used to educate consumers about conservation during the prior period, including a list of related web sites.
- Appendices A and B provide a list of the 2020 conservation programs offered by FEECA Utilities and a description of each program's purpose.

2019 Goalsetting Proceeding

In April 2019, the electric FEECA utilities filed proposed conservation goals, including numeric goals for summer demand, winter demand, and annual energy savings, for the 2020-2029 period. On November 5, 2019, the Commission chose to reject the goals proposed by the electric FEECA utilities. Instead, the Commission opted to continue with the goals that were established in the 2014 goalsetting proceeding for the period 2020-2024 and directed its staff to review the FEECA process for potential updates and revisions as may be appropriate.¹ In July 2020, a docket was established to consider proposed amendments to Rule 25-17.0021, F.A.C. Rule development workshops for this docket were conducted in January and May 2021.²

In May and June 2020, the Commission approved the filed DSM plans municipal electric FEECA utilities submitted.³ In August 2020, the Commission approved the DSM plans the investor-owned electric FEECA utilities submitted.⁴

¹Order No. PSC-2019-0509-FOF-EG, issued November 26, 2019, in Docket Nos. 20190015-EG through 20190021-EG, *In re: Commission review of numeric conservation goals*.

²See Docket No. 20200181-EU, Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities.

³Order No. PSC-2020-0140-PAA-EG, issued May 12, 2020, in Docket No. 20200058-EG, *In re: Petition for approval of 2020 demand-side management plan, by Orlando Utilities Commission*; Order No. PSC-2020-0200-PAA-EG, issued June 24, 2020, in Docket No. 20200057-EG, *In re: Petition for approval of 2020 demand-side management plan, by JEA*.

The 2014 approved goals were based on estimated energy and demand savings from measures that passed the Rate Impact Measure (RIM) and Participants cost-effectiveness tests.⁵ These tests were used to ensure that all ratepayers benefit from energy efficiency programs due to downward pressure on electric rates. Compared to its review in 2009, the Commission identified fewer cost-effective energy efficiency measures in 2014. This was as a result of more stringent building codes and appliance efficiency standards. Higher appliance efficiency standards and building codes contribute to conservation outside of utility-sponsored DSM programs. Additionally, reduced utility avoided costs, caused by relatively low natural gas prices at the time these goals were adopted, resulted in fewer cost-effective measures.

Section 366.82(2), F.S., also requires that the Commission adopt goals for increasing the development of demand-side renewable energy systems. The Commission recognized in its 2019 review, that Rule 25-6.065, F.A.C., Interconnection and Net Metering of Customer-Owned Renewable Generation, adopted in 2008, offered an effective means to encourage the development of demand-side renewable energy in the state. This rule allows customers a method for offsetting their energy usage. In addition, in 2020, the Commission initiated a fact-finding workshop to explore various topics regarding demand-side renewable energy system development.

The Commission also established numeric therm savings goals for a natural gas utility for the first time in 2019. In August 2019, the Commission approved 2019-2028 goals for PGS, based upon programs it found were cost-effective.⁶ PGS also developed audit programs for its residential and commercial customers as part of the proceedings. The 2019 goalsetting processes for all FEECA utilities are further discussed in Section 2.

2020 Achievements and Related Program Costs

FEECA has been successful in reducing the growth rates of winter and summer peak electric demand and reducing annual energy consumption. On a cumulative basis through 2020, savings from FEECA utility DSM programs have contributed to the statewide totals which reflect that summer peak demand has been reduced by 8,171 MW, winter peak demand has been reduced by 7,276 MW, and annual energy consumption has been reduced by 14,935 GWh.⁷ During 2020, the Florida electric FEECA utilities offered 125 residential and commercial programs which focused on demand reduction and energy conservation (see Appendix B). In addition, FEECA electric utilities performed over 229,000 residential and commercial energy audits in 2020, as shown in Section 3.3. Each FEECA utility's achievements toward the 2020 Commission-approved goals are detailed in Section 3.1.

⁴Order No. PSC-2020-0274-PAA-EG, issued August 3, 2020, in Docket Nos. 20200053-EG (TECO), 20200054-EG (DEF), 20200055-EG (FPL), 20200056-EG (Gulf), and 20200060-EG (FPUC), *In re: Petition for approval of 2020 demand-side management plans*.

⁵ Order No. PSC-14-0696-FOF-EU, issued December 16, 2014 (2014 Goalsetting Order), in Docket Nos. 20130199EI through 20130205-EI, *In re: Commission review of numeric conservation goals*.

⁶Order No. PSC-2019-0361-PAA-GU, issued August 26, 2019, in Docket No. 20180186-GU, *In re: Petition for approval of demand-side management goals and residential customer assisted and commercial walk-through energy audit programs, by Peoples Gas System*.

⁷Florida Reliability Coordinating Council (FRCC), *2021 Load & Resource Plan* (S-3, S-4, S-5).

The Commission has authority, by statute, to allow investor-owned utilities to recover costs related to conservation.⁸ The Commission has implemented this authority for electric IOUs through the ECCR clause since 1980. For 2020, Florida's investor-owned electric utilities recovered approximately \$320 million in conservation program expenditures.

Conclusion

Conservation in Florida is prompted by customer actions to conserve energy, federal appliance efficiency standards and state building codes for new construction, and utility-sponsored DSM programs. Customers can save energy and reduce their bills through behavioral changes and by investing in energy efficient homes, appliances, and equipment. Federal appliance efficiency standards have become more stringent over time, thus increasing the baseline energy efficiency of new appliances and heating, ventilation, and air conditioning (HVAC) equipment available to Florida's consumers. Likewise, changes in the Florida State Building Code (FLBC) have resulted in more energy efficient homes. Florida's electric and natural gas utilities also encourage conservation by offering energy audits, customer education, rebates on energy efficient equipment and building envelope improvements, and demand response programs.

Utilities design DSM programs to encourage conservation that exceeds levels set by current building codes and minimum efficiency standards. More stringent efficiency standards and building codes, as well as customer actions to implement efficiency outside of utility programs, reduce the potential incremental demand and energy savings available from utility-sponsored DSM programs. The level of realized savings from utility programs is uncertain because it requires voluntary participation and, in some cases, changes in customer behavior.

Because all customers pay for the utility conservation programs as a portion of their monthly utility bills, the Commission focuses on ensuring that all customers benefit from utility-sponsored DSM programs. The Commission also encourages customers to use energy efficiently through its customer education efforts. Overall, reducing Florida's electric demand and energy usage relies on customer education and participation in utility DSM programs, along with each individual's efforts to save electricity.

Conservation and renewable energy will continue to play an important role in Florida's energy future. The Commission is continuing its efforts to encourage cost-effective conservation that defers the need for new electric-generating capacity and reduces the use of fossil fuels. These initiatives support a balanced mix of resources that reliably and cost-effectively meet the needs of Florida's ratepayers.

⁸Section 366.05(1), F.S.

Section 1. Florida Energy Efficiency and Conservation Act

1.1 FEECA History and Implementation

FEECA emphasizes four key areas: reducing the growth rates of weather-sensitive peak demand and electricity usage, increasing the efficiency of electricity and natural gas production and use, encouraging demand-side renewable energy systems, and conserving expensive resources, particularly petroleum fuels. Pursuant to FEECA, the Commission is required to establish conservation goals and the FEECA utilities must develop DSM programs to meet those goals.

Originally, all electric utilities in Florida were subject to FEECA. In 1989, changes were made to the law limiting the requirement to electric utilities with more than 500 gigawatt-hours (GWh) of annual retail sales. At that time, 12 Florida utilities met this threshold requirement and their combined sales accounted for 94 percent of Florida's retail electricity sales. An additional change to the law encouraged cogeneration projects.

In 1996, the Florida Legislature raised the minimum retail sales threshold for municipal and cooperative electric utilities to 2,000 GWh. Retail sales for these utilities were measured as of July 1, 1993, and two municipal utilities met the threshold of the amended statute: JEA and OUC. In addition to these two utilities, all five Florida investor-owned electric utilities must comply with FEECA regardless of sales levels. No rural electric cooperatives are currently subject to FEECA.

FEECA also includes natural gas utilities whose annual retail sales volume is equal to or greater than 100 million therms. PGS is the only natural gas utility that meets the therm sales threshold for conservation goals under FEECA, and thus has its own Commission-approved DSM goals.

The FEECA statute also allows the Commission to provide appropriate financial rewards and penalties to the utilities over which it has rate-setting authority. The Commission also has the authority to allow an IOU to receive an additional return on equity of up to 50 basis points for exceeding 20 percent of its annual load growth through energy efficiency and conservation measures. To date, the Commission has not awarded financial rewards or assessed penalties for any of the IOUs through FEECA. The Commission does not have rate-setting authority over JEA and OUC and therefore cannot assess financial penalties or provide financial rewards under FEECA.

Table 1 lists the seven electric FEECA utilities and shows their 2020 retail electricity sales and the percentage of total statewide electricity sales by each utility. The table also includes the total energy sales for all non-FEECA utilities. Currently, the seven electric utilities that are subject to FEECA account for approximately 83.9 percent of all Florida energy sales.

Table 1
Energy Sales by Florida's Electric FEECA Utilities in 2020

Florida's Electric FEECA Utilities	Energy Sales (GWh)	Percent of Total Energy Sales
Florida Power & Light Company	113,531	46.9%
Duke Energy Florida, LLC	39,230	16.2%
Tampa Electric Company	19,954	8.2%
JEA	12,319	5.1%
Gulf Power Company	10,764	4.4%
Orlando Utilities Commission	6,751	2.8%
Florida Public Utilities Company	646	0.3%
Electric FEECA Utilities' Total	203,195	83.9%
Non-FEECA Utilities' Total	39,128	16.1%
Total Statewide Energy Sales	242,323	100.0%

Source: FPSC's *Statistics of the Florida Electric Utility Industry* (Table 26) published in October 2021.

Sections 366.82(2) and 366.82(6), F.S., require the Commission to set demand-side management goals at least every five years for the utilities subject to FEECA. The Commission sets electric goals with respect to summer and winter electric-peak demand and annual energy savings over a ten-year period, with a re-evaluation every five years. Once goals are established, the electric FEECA utilities must submit DSM plans containing cost-effective programs intended to meet the goals for Commission approval.

In 2008, the Florida Legislature amended the FEECA statute, placing upon the Commission additional responsibilities when adopting conservation goals. These responsibilities included the consideration of the benefits and costs to program participants and ratepayers as a whole, as well as the need for energy efficiency incentives for customers and utilities. The Commission must also consider any costs imposed by state and federal regulations on greenhouse gas emissions.

1.2 FEECA's Influence on the Florida Energy Market

FEECA's mission is important to Florida's overall energy market. Florida's total electric consumption ranks among the highest in the country due to its sizeable population and climate-induced demand for cooling. When compared to the rest of the country, Florida's energy market is unique. The distinction is largely due to the state's climate, the high proportion of residential customers to total customers, and the reliance on electricity for heating and cooling.

Florida is typically a summer-peaking state, since the summer peak demand generally exceeds winter peak demand. On a typical summer day, the statewide demand for electricity can increase significantly over a span of hours.⁹ Additionally, 87.7 percent of Florida's electricity customers are residential and consume 55 percent of the electrical energy produced. In contrast, nationally,

⁹FPSC's *Review of the 2021 Ten-Year Site Plans of Florida's Electric Utilities* (October 2021).

residential customers account for only 40 percent of total electric sales, while commercial customers represent 35 percent of electric consumption, and industrial customers represent 25 percent.¹⁰ Table 2 shows the makeup of Florida’s electric customers by class and consumption.

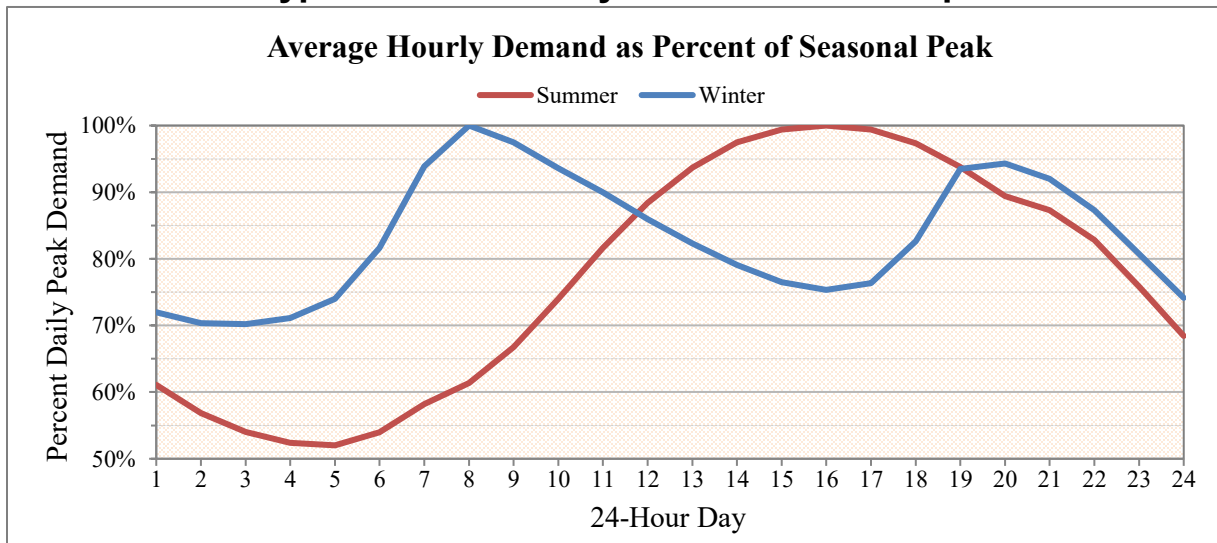
Table 2
Florida's Electric Customers by Class and Consumption in 2020

Customer Class	Number of Customers	Percent of Customers	Energy Sales (GWh)	Percent of Sales
Residential	9,737,740	87.7%	133,202	55.0%
Commercial	1,186,216	10.7%	83,101	34.3%
Industrial	24,396	0.2%	19,603	8.1%
Other*	155,948	1.4%	6,417	2.6%
Total	11,104,300	100.0%	242,323	100.0%

*Street and highway lighting, sales to public authorities, and interdepartmental sales.
Source: FPSC's *Statistics of the Florida Electric Utility Industry* (Tables 26 and 33) published October 2021.

Figure 1 shows the daily electric load curves for a typical Florida summer and winter day. In the summer, air conditioning demand starts to increase in the morning and peaks in the early evening; a pattern which aligns with the sun’s heating of buildings. In comparison, the winter load curve has two peaks—the largest in mid-morning, followed by a smaller peak in the late evening—which correspond to heating loads.

Figure 1
Typical Florida Daily Electric Load Shapes



Source: FPSC's *Review of 2021 Ten-Year Site Plans of Florida’s Electric Utilities* published October 2021.

¹⁰National data as reported for 2020 by the U.S. Energy Information Administration in the annual *Electric Sales, Revenue, and Average Price (ESR)* report (Table 1): https://www.eia.gov/electricity/sales_revenue_price/

Residential load patterns are rapidly shifting and have high peak-to-trough variation. In contrast, commercial or industrial loads demonstrate more consistency throughout the 24-hour day and experience fewer spikes in demand.

Utilities dispatch additional generating capacity throughout the day in order to follow the customer load patterns. Peaking generating units, are dispatched during high demand periods of the day, and are less fuel-efficient than baseload or intermediate generating units. Utility DSM programs play a role in reducing energy usage and shifting peak demand, thus reducing the need to dispatch fuel-inefficient generating units.¹¹ Over time, the need for additional generating capacity has increased in Florida, largely due to population growth. In addition to providing fuel savings at existing generating units, utility-sponsored DSM programs and individual consumer conservation efforts can avoid or defer the need for new electric generating capacity.

Utility-sponsored DSM programs are funded by all ratepayers. Therefore, in order to meet FEECA requirements, the Commission and utilities must ensure that the DSM programs created to reap the benefits of reduced fuel usage and deferred generating capacity are cost-effective, i.e. less costly than generation. The Commission's methodologies to determine the cost-effectiveness of demand-side management programs are explained in detail in Section 2.1.

Since its enactment, FEECA has been successful in reducing the growth rate of weather-sensitive electric peak demands, and in conserving expensive resources. These savings have avoided or deferred the need for new generating capacity and offset the use of existing generating units, resulting in savings of fuel, as well as variable operations and maintenance (O&M) costs. During 2020, FEECA utility DSM programs continued contributing to the reduction of statewide energy needs and deferred the need for new generating capacity. Table 3 details cumulative savings for summer peak demand, winter peak demand, and overall energy consumption through 2020, as reported in the Florida Reliability Coordinating Council (FRCC)'s 2021 Regional Load & Resource Plan. In 2020, the FEECA DSM programs contributed annual energy savings of 187.1 GWh, which is enough electricity to power approximately 13,929 homes for a year.¹²

¹¹Electric generating units are typically categorized as baseload, intermediate, or peaking. Aside from planned and forced outages, baseload units are scheduled to operate continuously. Intermediate units generate power to follow load for periods of time, but are not planned to operate nonstop. Peaking units supplement baseload and intermediate power, operating during high-demand, or peak periods.

¹²This estimate is based on an average annual household energy use of 13,704 kWh for Florida in 2020 as reported by the U.S. Energy Information Administration in the annual *Electric Sales, Revenue, and Average Price (ESR)* report (Table 5.a): https://www.eia.gov/electricity/sales_revenue_price/

Table 3
Statewide Cumulative Demand and Energy Savings (Through 2020)

Type	Achieved Reduction
Summer Peak Demand	8,171 MW
Winter Peak Demand	7,276 MW
Annual Energy Reduction	14,935 GWh

Source: Florida Reliability Coordinating Council’s 2021 Regional Load & Resource Plan (S-3, S-4, S-5).

In 2020, the electric FEECA utilities provided 125 programs for residential, commercial, and industrial customers (see Appendix B). Programs focus on either reducing energy use at a given moment, which shifts/reduces demand, or toward reducing overall energy consumption over a period of time. Utility-sponsored DSM programs are an important means of achieving demand and energy savings and these programs are designed to encourage customer conservation efforts.

Additionally, residential energy audits, required by Section 366.82(11), F.S., serve as an avenue to identify and evaluate conservation opportunities for customers, including their potential participation in utility-sponsored DSM and conservation programs. Energy audits also educate customers about behavioral changes and energy efficiency investments they can make outside of utility-sponsored DSM programs. During 2020, FEECA electric utilities performed 223,146 residential audits. Though FEECA does not require commercial energy audits, FEECA electric utilities also performed 6,071 commercial energy audits in 2020. Additional information about these results is presented in Section 3.

1.3 Recovery of Conservation Expenditures

The IOUs are allowed by Commission Rule 25-17.015, F.A.C., to recover reasonable expenses for DSM programs through the ECCR clause. Such expenses may include administrative costs, equipment, and incentive payments. Before attempting to recover costs through the ECCR clause, a utility must provide data on DSM program cost-effectiveness. Utilities must have Commission approval for any new programs or program modifications prior to seeking cost recovery.

Commission Rule 25-17.015, F.A.C., also permits natural gas LDCs to seek recovery for costs related to Commission-approved conservation programs. While PGS is the only natural gas utility subject to FEECA, the other Florida LDCs offer Commission-approved DSM programs without a specific therm savings goal. Natural gas conservation programs have historically focused on providing rebates to residential customers that support the replacement of less efficient appliances with new, energy-efficient gas appliances. However, several LDCs have expanded their rebate programs to commercial customers.¹³

On an annual basis, the Commission conducts financial audits of DSM program expenses that are included in the electric IOUs’ and LDCs’ cost recovery requests. A full evidentiary hearing is

¹³Order No. PSC-14-0039-PAA-EG, issued January 14, 2014, in Docket No. 130167-EG, *In re: Petition for approval of natural gas energy conservation programs for commercial customers, by Associated Gas Distributors of Florida.*

held to determine the cost recovery factors to be applied to customer bills in the following year. The Commission-approved 2022 conservation cost recovery factors are discussed further in Section 4.

Section 2. DSM Goalsetting

2.1 DSM Program Cost-Effectiveness and Energy Savings

Section 366.81, F.S., requires utility conservation programs to be cost-effective. This statutory requirement is codified in Rule 25-17.008, F.A.C., for electric utilities and Rule 25-17.009, F.A.C., for natural gas LDCs. The rules identify the cost-effectiveness methodologies to be used and require that utilities provide cost and benefit information to the Commission when requesting to add a program or make changes or additions to an existing program.

The Commission requires that electric utilities measure cost-effectiveness from three perspectives, at a minimum - the program participant, the utility's ratepayers, and society's overall cost for energy services. The Participants test, the Rate Impact Measure (RIM) test, and the Total Resource Cost (TRC) test capture these viewpoints. The electric FEECA utilities are required to provide the results of all three tests when seeking to add a new program or make changes to an existing program.

Similarly, Rule 25-17.009, F.A.C., requires natural gas LDCs to provide the results of the Participants test and Gas Rate Impact Measure Test (GRIM). The GRIM test is a modified version of the RIM test, specific to gas utilities. Natural gas LDCs are also required to provide the results of these tests when seeking to add a new program or modify an existing program.

Table 4 summarizes the costs and benefits considered in the three Commission-approved electric cost-effectiveness methodologies for electric utilities.

Table 4
Summary of Electric Cost-Effectiveness Methodologies

	Participants	RIM	TRC
Benefits			
Bill Reduction	X		
Incentives Received	X		
Avoided Generation (Capital and O&M)		X	X
Avoided Transmission (Capital and O&M)		X	X
Fuel savings		X	X
Costs			
Program Costs		X	X
Incentives Paid		X	
Lost Revenues		X	
Participant's Costs (Capital and O&M)	X		X

Participants Test

The Participants test analyzes costs and benefits from a program participant's point of view, rather than the impact on the utility and other ratepayers not participating in the program. The Participants test includes the up-front costs customers pay for equipment and costs to maintain this equipment. Benefits considered in the test include the incentives paid by utilities to the customers and the reduction in customer bills. Failure to demonstrate cost-effectiveness under this test would infer that rational customers would not elect to participate in this program.

Rate Impact Measure (RIM) Test

The RIM test is designed to ensure that all ratepayers, not just the program's participants, will benefit from a proposed DSM program. The RIM test includes the costs associated with incentive payments to participating customers and decreased revenues to the utility. DSM programs can reduce utility revenues due to reduced kilowatt-hour (kWh) sales and reduced demand. The decreased utility revenues typically are recovered from the general body of ratepayers at the time of a rate case. A DSM program that passes the RIM test ensures that all customer rates are the same or lower than rates would be without the DSM program.

Total Resource Cost (TRC) Test

The TRC test measures the overall economic efficiency of a DSM program from a social perspective. This test measures the net costs of a DSM program based on its total costs, including both the participants' and the utility's costs. Unlike the RIM test, customer incentives and decreased utility revenues are not included as costs in the TRC test. Instead, these factors are treated as transfer payments among ratepayers. Moreover, if appropriate, certain external costs and benefits such as environmental impacts may be taken into account. Because incentives and foregone revenues are not treated as "costs," electric rates for all customers tend to be higher for programs implemented solely using the TRC test to judge cost-effectiveness.

Ensuring Cost-Effectiveness

Ensuring utility-sponsored DSM programs remain cost-effective benefits the general body of electric ratepayers. These programs can reduce costs to ratepayers by postponing capital expenditures such as future power plant construction, and reducing current electrical generation costs, including fuel and variable O&M costs. DSM programs can also benefit customers by improving reliability.

When an IOU determines that a DSM program is no longer cost-effective, the utility should petition the Commission for modification or discontinuation of the program. In many instances, programs may need to be modified due to the adoption of a more stringent appliance efficiency standard or building code. In contrast, if new efficiency measures become available that are cost-effective, the utility may petition the Commission for approval of a new program.

2019 Electric DSM Goalsetting Proceeding

Pursuant to Sections 366.82(2) and 366.82(6), F.S., the electric FEECA utilities filed proposed goals for the 2020-2029 period in April 2019. The utilities' proposed goals were lower overall than those established in the 2014 goalsetting proceeding, with some utilities proposing goals of zero or near-zero for the 10-year period. A technical hearing on the proposed goals was held on August 12 and 13, 2019. The Commission heard testimony on cost-effectiveness tests, whether a

goal of zero fulfilled statutory requirements, how to account for free ridership, and how to ensure low-income customers are able to effectively participate in DSM programs.

By issuing Order No. PSC-2019-0509-FOF-EG¹⁴ on November 26, 2019, the Commission rejected the goals proposed by the electric FEECA utilities and chose to continue with the 2020-2024 portion of the goals established in the 2014 goalsetting proceeding.¹⁵ While the goalsetting process produces annual goals, the cumulative goals for the entire 10-year period are shown in Table 5 for illustrative purposes. The Commission also expressed a desire to review the goalsetting process for potential revisions. In July 2020, a docket was established to consider proposed amendments to Rule 25-17.0021, F.A.C. Rule development workshops for this docket were conducted in January and May, 2021.¹⁶

Table 5
Cumulative Commission-Approved Electric DSM Goals, 2015-2024

Electric Utility	Summer Demand Goals (MW)	Winter Demand Goals (MW)	Annual Energy Goals (GWh)
FPL	526.1	324.2	526.3
DEF	259.1	419.3	195.0
TECO	56.3	78.3	144.3
Gulf	68.1	36.7	84.2
FPUC	1.3	0.4	2.0
OUC	5.0	8.4	13.0
JEA	10.8	9.7	25.8
Total	926.7	877.0	990.6

Source: Order No. PSC-14-0696-FOF-EU.

The goals established in 2014 were based upon estimated energy and demand savings from measures that passed both the RIM and Participants cost-effectiveness tests. Measures that pass the Participants test ensure that participating customers’ benefits exceed the costs of the measure or program to the participants. Use of the RIM test minimizes subsidies between customers who participate in DSM programs and those who do not participate but pay for program expenditures. The RIM test also ensures rates would remain the same or lower than otherwise would occur.

As part of its review of goals in 2019, the Commission recognized Rule 25-6.065, F.A.C., (Customer-Owned Renewable Generation Rule) as an effective means of encouraging the development of demand-side renewable energy systems. Figure 2 shows the growth in the

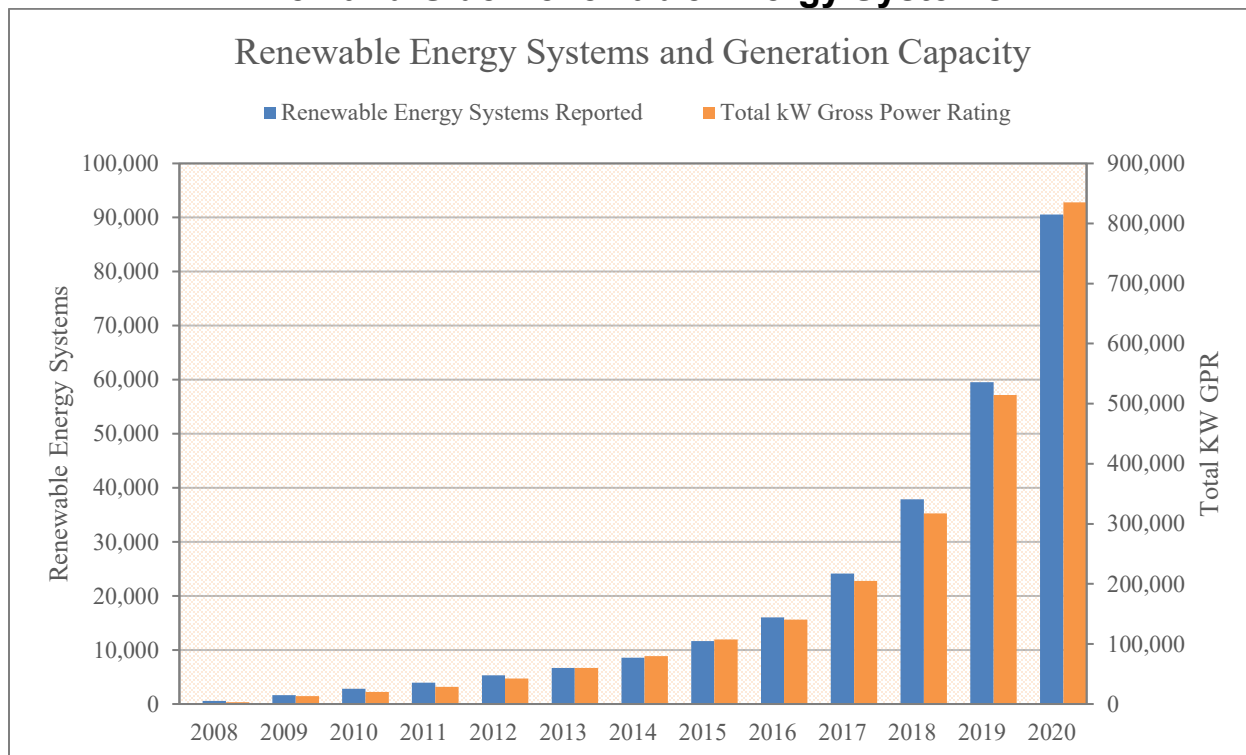
¹⁴ Order No. PSC-2019-0509-FOF-EG, issued November 26, 2019, in Docket Nos. 20190015-EG through 20190021-EG, *In re: Commission review of numeric conservation goals*.

¹⁵ Within 90 days of the issuance of the Order approving goals, the electric FEECA Utilities shall file individual DSM plans designed to meet their approved goals.

¹⁶ See Docket No. 20200181-EU, Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities.

number of customer-owned renewable energy systems in Florida, as well as the growth in gross power ratings (i.e. generating capacity) since the Commission’s approval of net-metering in 2008.

**Figure 2
Demand-Side Renewable Energy Systems**



Source: Data compiled from Interconnection and Net Metering Reports provided to the Commission from IOU, municipal, and rural electric cooperative electric companies, 2008-2020.

2.2 Summary of the 2019 Goalsetting Process for Peoples Gas

PGS is the only natural gas utility that meets the therm sales threshold for establishing conservation goals under FEECA. In October 2018, PGS filed a petition for approval of numeric therm reduction goals for the 2019-2028 period. PGS estimated its goals based upon its current Commission-approved DSM programs. Because PGS had existing programs already in place, there is expected to be no additional cost to its customers, aside from the costs of the new audit programs. PGS utilized the Participants and GRIM tests to calculate its goals.¹⁷ The Commission approved the goals for PGS in Order No. PSC-2019-0361-PAA-GU, issued on August 26, 2019. Table 6 shows the 10-year therm-savings goals for PGS over the 2019-2028 period.

¹⁷Rule 25-17.009, F.A.C., requires natural gas utilities that seek to recover costs for conservation programs to file the cost-effectiveness test results of the Participants test and the GRIM test.

Table 6
Commission-Approved DSM Goals for PGS, 2019-2028

Cumulative Savings (Therms)		
Residential	Small-Commercial	Combined
3,749,583	2,426,634	6,176,217

Source: Order No. PSC-2019-0361-PAA-GU.

PGS was also required to develop a residential audit program as part of the goalsetting process. However, PGS filed for and was granted a waiver of Rules 25-17.003(3)(a) and (b), F.A.C., which require all FEECA utilities to offer residential customers three different types of on-site audits - Building Energy Efficiency Rating System (BERS) Audits, Computer-Assisted Audits, and Walk-Through Audits. PGS argued that the on-site audits would impose a substantial hardship on the Company and that the purpose of the underlying statute can be achieved by other means. The Commission allowed PGS to offer an electronic, online-only audit in lieu of on-site audits for residential customers. The Commission approved the implementation of the electronic audits for PGS’s residential customers, as well as on-site audits for its commercial customers, beginning in 2020. Customers of PGS are still eligible to receive walk-through energy audits through their electricity provider.

In November 2019, a docket was established to consider the petition from PGS for Approval of Demand-Side Management Plan and Standards together.¹⁸ In June 2020, PGS informed the Commission of its intention to revise programs in an amended filing. In February 2021, an Amended Petition for Approval of Demand-Side Management Plan was filed. By Order No. PSC-2021-0242-PAA-EG, the revised filing was approved.¹⁹

2.3 Impact of Outside Factors on FEECA Utility DSM Programs

Conservation in Florida is prompted by customer actions to conserve energy, federal appliance efficiency standards, state building codes, and utility-sponsored DSM programs. Customers can save energy and reduce their bills through behavioral changes and by investing in energy efficient homes, appliances, and equipment. Federal appliance efficiency standards have become more stringent over time, thus increasing the baseline energy efficiency of new appliances and heating and air conditioning equipment available to Florida’s consumers. Likewise, changes in the Florida State Building Code (FLBC) have resulted in more energy efficient homes.

Utilities design DSM programs to encourage conservation that exceeds levels set by current building codes and minimum efficiency standards. However, the cost-effectiveness of DSM measures has declined due to several factors outside of the FEECA utilities’ control. More stringent state and federal efficiency standards, building codes, and customer actions to

¹⁸See Docket No. 20190210-EG, Petition for approval of demand-side management plan, by Peoples Gas System.

¹⁹Order No. PSC-2021-0242-PAA-EG, issued July 2, 2021, in Docket No. 20190210-EG, *In re: Petition for approval of demand-side management plan, by Peoples Gas System.*

implement efficiency outside of utility programs, reduce the potential incremental demand and energy savings available from utility-sponsored DSM programs.

Federal efficiency standards and state building codes establish a baseline in assessing the cost-effectiveness of a potential DSM program. Florida utility DSM programs offer rebates and incentives for appliances that exceed federally established minimum efficiency standards. However, increases in federal efficiency standards, independent conservation efforts by consumers, and general conservation practices make it more challenging for utilities to achieve demand and energy savings through DSM programs. Moreover, participation rates in the utility programs are driven by the anticipated payback to the participating customer. While utility incentives tend to increase customers' "take rate" in conservation programs, electric rates are also a contributing factor in customers' decisions to invest in more efficient appliances. Thus, low or declining electric rates tend to reduce customer energy efficiency investments, while increasing rates can have the opposite effect. This makes it crucial that the FEECA utilities frequently evaluate conservation programs to ensure that they remain cost-effective. Likewise, the FEECA utilities are also expected to evaluate the potential for new, cost-effective DSM program opportunities as energy-efficiency technologies develop.

State Building Code

At the state level, the FLBC is amended annually to incorporate interpretations and clarifications as well as to update efficiency standards. The Florida Building Commission updates the FLBC with relevant new standards every three years. In 2017, the FLBC was updated and became effective in December 2017. After review of the 2017 FLBC and the DSM programs that were current at that time, FEECA utilities reported that the code update had no impact on the programs that had been established during the 2014 goalsetting proceeding. In 2020, the FLBC was updated to the Seventh Edition, which became effective in December 2020. In August 2021, a supplement to the Seventh Edition was issued. While there were several changes in both documents that pertain to construction standards, no changes were made to Chapter 11, Energy Efficiency, and none of the FEECA utilities made regulatory filings to modify DSM Plans or programs as a result of FLBC code updates.²⁰

Federal Government Efficiency Standards

At the federal government level, the U.S. Department of Energy's (DOE) Building Technologies Office sets energy efficiency standards for more than 60 categories of appliances and other equipment, including HVAC equipment.²¹ Within the Building Technologies Office, the Appliances and Equipment Standards Program maintains a multi-year rulemaking schedule that establishes minimum energy efficiency standards and test procedures which are the basis for these standards. The products regulated by DOE standards represent about 90 percent of home,

²⁰Details of the Seventh Edition (2020) Florida Building Code and 2021 Supplement to the 7th Edition (2020) Florida Building Code can be found at https://www.floridabuilding.org/fbc/Links_to_Code_Resources.html.

²¹Pursuant to Section 553.975, F.S., the Commission must report the effectiveness of state energy conservation standards established by Sections 553.951-553.973, F.S. Florida's appliance efficiency standards are mandatory efficiency improvements but have not been updated since 1993, and therefore have likely been superseded by more recent federal efficiency standards.

60 percent of commercial building, and 30 percent of industrial energy use.²² Some of the consumer products regulated by these Conservation Standards and Test Procedures include laundry appliances, dishwashers, microwave ovens, televisions, and several other common household products. In addition to consumer products, there are categories for lighting, plumbing, and commercial/industrial products.²³ Deadlines for reviewing many of these standards were not met in 2020. However, in January 2021, an executive order from the President of the United States was issued which included direction to address the overdue rule and test procedure reviews.²⁴ In the August 2021 Report To Congress, DOE conveyed that since the last Report to Congress (July 2019), 123 rulemaking actions related to energy conservation standards and test procedures have been completed. Of this total, 71 of the actions were related to energy conservation standards rulemaking notices, with 15 being final actions. Examples of the equipment for which final actions were taken include ceiling fans, commercial air compressors, dishwashers, fluorescent light ballasts, and portable air conditioners. The full list, including information on the fifty two rulemaking notices that relate to test procedures, is accessible via the link identified in the footnote below.²⁵

Federal standards that change the baseline requirements for a product may have a direct effect on DSM programs. If a DSM program is no longer cost effective as a result of changing federal standards, then the utility should file a petition to modify or discontinue the program.

²²Federal Appliance and Equipment Standards Program: <http://energy.gov/eere/buildings/appliance-and-equipment-standards-program>.

²³ Federal Conservation Standards and Test Procedures: <http://energy.gov/eere/buildings/standards-and-test-procedures>.

²⁴ Executive Order No. 13990, 86 Federal Register 7037 (January 25, 2021): <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01765.pdf>

²⁵U.S. Department of Energy, Semi-Annual Report to Congress on Appliance Energy Efficiency Rulemakings, Energy Conservation Standards Activities (August 2021): <https://www.energy.gov/sites/default/files/2021-08/EXEC-2019-005022%20-%20Final%20Report%20ksb.pdf>

Section 3. FEECA Utilities' Goal Achievements

3.1 Assessing Goal Achievement

Commission rules require separate goals be set for electric residential and commercial/industrial (C/I) customers, assigning context to measuring goal achievement within these two primary customer categories. Each utility's achievements in these categories are also combined and compared against total demand and energy savings goals.

Every FEECA utility must file an annual DSM report pursuant to Rule 25-17.0021, F.A.C., which summarizes demand savings, energy savings, and customer participation rates for each approved program. The report also includes the residential, C/I, and total energy efficiency achievements compared to the approved DSM goals. Each FEECA utility's current (2020) and archived annual DSM reports from prior years can be found on the Commission's website: <http://www.psc.state.fl.us/>.

Monitoring annual goal achievements enables the Commission to evaluate the effectiveness of each utility's programs. In addition to reviewing the FEECA utilities' annual DSM reports, staff issues discovery requests for additional information from the utilities on their demand and energy saving achievements. Staff's data requests also seek explanations of factors preventing the utilities from achieving projected participation levels. Each FEECA utility's DSM performance in 2020 is discussed below. The utility achievements have been compared to the annual goals established by the Commission in November 2014 and reapplied in August 2021. Table 7 provides a breakdown of each electric utility's goal achievements for the period.

FPL

FPL met all of its goals for the C/I customer class, and also achieved its goals for total winter and summer demand reduction, but did not achieve its goal for total energy savings in 2020. FPL did not achieve any of its 2020 goals for the residential customer class. FPL stated that its performance in this sector was attributable to fewer in-home audits beginning in March, since those activities were suspended due to COVID-19 restrictions.

DEF

DEF met its 2020 total demand and energy savings goals and all C/I customer class goals. Although DEF suspended the installation of in-home measures for its customers in March in response to the COVID-19 pandemic, the company achieved its summer demand reduction and energy savings goals for the residential customer class in 2020, and it missed achieving its winter demand reduction goal by a very small margin.

TECO

TECO met its 2020 total demand and energy savings goals and all C/I customer class goals. For the residential customer class, TECO achieved its energy savings goals in 2020, although it missed achieving its winter and summer demand reduction goals. As a response to the COVID-19 pandemic, TECO suspended face-to-face in-home interactions for the safety of its customers, employees, and contractors. The company believes fewer interactions impacted its ability to achieve the demand reduction goals for the residential customer class.

Gulf

Gulf achieved its 2020 goal for winter demand reduction for the C/I customer class, but did not achieve any other goals in 2020. Gulf stated that the COVID-19 pandemic significantly impacted the delivery of many of Gulf's DSM programs. Gulf suspended traditional outreach activities that are ordinarily the primary driver of many DSM programs. By not participating in home shows and community events, Gulf had fewer opportunities to engage with residential and C/I customers. In addition, suspending employee visits in customers' homes and business locations beginning in March, suppressed its ability to offer programs to achieve its residential and some C/I customer class goals.

FPUC

FPUC met all of its 2020 total demand and energy savings and residential goals, stating that enhanced participation in its Residential Heating and Cooling Upgrade program as the principle reason. The company did not meet any of its 2020 goals for the C/I sector, although goal achievement improved in this customer class compared to 2019.

JEA

JEA met its 2020 total demand and energy savings goals and all individual customer class goals.

OUC

OUC met its 2020 total demand and energy savings goals and all individual customer class goals.

Table 7
Electric DSM Goals Compared to Annual (2020) Achievements

Utility	Winter (MW)		Summer (MW)		Annual (GWh)	
	Goals	Achieved Reduction	Goals	Achieved Reduction	Goals	Achieved Reduction
FPL*						
Residential	16.7	11.5	26.9	20.0	25.0	20.6
Commercial/Industrial	16.1	28.6	26.2	40.2	28.7	30.7
Total	32.8	40.1	53.1	60.2	53.7	51.3
DEF*						
Residential	32.0	31.0	16.0	18.0	9.0	35.0
Commercial/Industrial	5.0	24.0	8.0	46.0	6.0	40.0
Total	37.0	55.0	24.0	64.0	15.0	75.0
TECO*						
Residential	7.6	3.5	3.3	2.6	7.4	8.9
Commercial/Industrial	1.7	10.4	3.5	11.8	10.3	26.1
Total	9.3	13.9	6.8	14.4	17.7	35.0
Gulf*						
Residential	3.8	1.1	6.7	1.6	6.8	2.2
Commercial/Industrial	0.2	0.0	0.8	1.0	2.5	2.2
Total	4.0	1.1	7.5	2.6	9.3	4.4
FPUC*						
Residential	0.028	0.142	0.089	0.253	0.060	0.488
Commercial/Industrial	0.018	0.001	0.052	0.018	0.168	0.044
Total	0.046	0.143	0.141	0.271	0.228	0.532
JEA						
Residential	0.960	1.794	0.940	2.004	2.500	3.940
Commercial/Industrial	0.007	0.582	0.140	1.188	0.080	6.240
Total	0.967	2.376	1.080	3.192	2.580	10.180
OUC						
Residential	0.210	0.821	0.210	0.763	0.770	1.628
Commercial/Industrial	0.700	1.960	0.390	2.325	0.850	9.087
Total	0.910	2.782	0.600	3.087	1.620	10.715

*Bold numbers indicate the utility did not meet its annual goals within that category.

Source: FEECA utilities' demand-side management annual reports.

PGS

Table 8 provides a breakdown of the goal achievements for PGS for the period. Therm-savings goals for PGS were first approved in August 2019. PGS met its 2020 total energy reduction goal and its individual customer class goals.

Table 8
PGS DSM Goals Compared to Annual (2020) Achievements

Utility	Annual Energy Reduction (Therms)	
	Goals	Achieved Reduction
PGS		
Residential	347,108	416,915
Commercial/Industrial	222,062	285,662
Total	569,170	702,577

Source: PGS' demand-side management annual report.

3.2 Program Impacts of COVID-19

The COVID-19 pandemic profoundly impacted DSM program implementation in 2020 for Florida's electric FEECA utilities. COVID-19 led each FEECA utility to restrict implementation of DSM programs requiring face-to-face or on-site contact with their customers in 2020. All FEECA utilities suspended offering conservation programs that involved employee visits to customers' homes beginning in March 2020. In a few instances, the duration of suspensions was brief. Many program suspensions were lifted in the 4th quarter of the year, although in a few limited cases, some programs remained suspended for the remainder of 2020 and into 2021.

The FEECA utilities responded to this challenge through enhanced communications with their customers using traditional channels (radio, television, bill messaging, and print mediums), as well as internet-based and social media (Facebook and Twitter) platforms. In addition, the FEECA utilities frequently updated information regarding the availability of their conservation programs on their corporate websites, and some entities developed webinars and other informative content for their customers. For the first time, the FEECA utilities also communicated with their customers using technology-based applications (FaceTime, Teams, and Zoom) in efforts to assist customers to learn about and engage in conservation programs and measures. Discussed below is a summary of the extraordinary practices the FEECA utilities implemented in response to COVID-19 impacts.

FPL

Many of FPL's residential and commercial conservation programs were suspended between March and October of 2020. Throughout 2020, FPL posted and updated its website messaging about the conservation programs that were suspended. The company also enhanced the training for call-center and customer-facing workforces in order to encourage customers to participate in telephonic and virtual audit programs, which were continuously offered through 2020. Although in-person audit programs were not offered for portions of 2020, all customers who requested an in-home survey were encouraged to complete the survey via phone or video, and customers who

preferred an onsite survey were put on a call-back list to be notified once field visits resumed. According to FPL, the success of advisor-led virtual phone surveys led the company to continue offering this service to their customers as it allows for flexible scheduling and is a less intrusive method for completing an energy survey.

During 2020, FPL also adjusted its Residential Ceiling Insulation program to allow insulation contractors to directly deliver the program to FPL customers without a pre-qualification that would normally result from an audit. To promote best practices and also its portfolio of conservation programs for customers in the business and commercial class, FPL produced and offered an energy efficiency-related webinar in 2020.

DEF

In 2020, COVID-19 impacted DEF's residential and commercial conservation programs for varying durations. The company's Non-Residential Demand Response program had the shortest suspension, lasting about two weeks, while other programs, such as Home Energy Check (DEF's in-home audit program), were suspended in mid-March 2020, restored in mid-June, and then suspended again in early November 2020 for the remainder of the calendar year.

Like FPL, DEF actively posted current information about conservation programs on its website, and also made use of video conferencing tools as an alternative to face-to-face communications. Prior to 2020, the Company sponsored in-person events to promote the Neighborhood Energy Saver program. COVID-related impacts in 2020, however, prompted DEF to develop plans to promote this program through a virtual event.

The company relied more heavily on its online and social media outlets (Facebook and Twitter) for messaging about the conservation programs, and increased its promotion of telephonic and online audits. For customers who initiated contact with the company about in-home audits or other suspended programs, DEF instituted waitlists during the period(s) when suspensions were in place. Although lower costs in some programs were recorded in 2020 due to suspensions throughout the year, higher expenses for incentives were incurred in the Interruptible Service Program, which contributed to the slight rise in overall costs for all programs. Despite suspending in-home audits for portions of 2020, DEF was the only FEECA electric utility to record an increase in overall audit participation in 2020.²⁶

TECO

TECO suspended on-site appointments in March 2020 and followed protocols which deferred face-to-face interaction with customers. TECO pursued energy education for its customers through traditional and emerging communication channels. Through its website and other digital avenues, the company provided information about suspended conservation programs, while also actively promoting the non-suspended programs. According to TECO, the company placed an emphasis on promoting telephonic and online audits, and like DEF, created wait-lists to accommodate requests for in-home audits or other suspended programs. All customers awaiting an energy audit were offered an initial phone audit, as well as an evaluation of their ceiling

²⁶Tables 9 and 10, which appear on Pages 26 and 28 in this report, provide additional information from all of the FEECA electric utilities on the number of residential and commercial/industrial audits conducted in 2020.

insulation and ductwork, if outside access was available. TECO's online customer portal featured popup messaging to promote Online Energy Audits, allowing instant access for information and sign-ups. TECO's Commercial Energy Management Team offered a virtual energy efficiency webinar to offer information on phone audits and energy efficiency assistance geared specifically to commercial/industrial customers.

TECO also implemented some process changes that allowed on-going participation in some of the company's COVID-impacted DSM programs. Working through its vendors, the company allowed photographs to document the installation of qualifying energy efficient equipment. TECO also implemented an electronic signature tool in order to enroll customers in load management and demand response programs. For the company's Weatherization program, TECO specialists ordinarily install all of the items in the energy efficiency kits that are offered with that program. However, during the period of COVID-related suspensions, the company mailed the kits and instructed the participating customers to self-install what they were comfortable with, leaving the remaining items for a specialist to install at a later date. For these participating customers, TECO plans to initiate contact when restrictions expire.

TECO developed and launched social media content focused on educating its customers on energy saving tips, while simultaneously promoting its conservation programs. In 2020, a team of TECO specialists created seven conservation-related videos for social media outlets, including one offered in Spanish. This content offered information on the benefits of participating in company-sponsored programs, along with topics that ranged from water heating to adjusting thermostat settings.

Gulf

Gulf, like DEF, began suspensions in March 2020 and ended them at various dates through the following year. Gulf suspended all on-site visits in March 2020 through the remainder of the year. Although two residential programs, Energy Select and the Low-Income Community Energy Saver, were only suspended between March and July of 2020, the programs operated in the latter part of 2020 under very limited capacities.

Like FPL, Gulf shifted its messaging to encourage customers to participate in telephonic and virtual audit programs, which were offered through 2020 in lieu of in-person audits. Gulf adjusted how it communicated with its customers through increased use of internet-based platforms and its social media (Facebook and Twitter) avenues to educate customers and also offer information about conservation programs.

Gulf introduced surveys via phone or video for their residential and commercial customers, which allowed customers to receive a personal consultation while maintaining its suspension of in-person visits to homes and businesses. Gulf stated that any customers who preferred an on-site energy audit were put on a call-back list for notification once field visits resumed.

Late in 2020, Gulf took steps designed to solidify its relationships with its preferred vendors in conjunction with three new residential programs (HVAC, Ceiling Insulation, and High Efficiency Pool Pump). By the second quarter of 2021, Gulf had resumed offering all of its residential and business conservation programs.

FPUC

FPUC's two audit programs that feature on-site visits, the Residential Energy Survey Program and the Commercial Energy Consultation Program, were suspended in March and remained suspended for the balance of 2020. To provide an alternative for customers requesting an on-site audit, the company offered an online energy survey, and helped customers with over the phone audits as well. In addition, the company updated its free online energy survey software and conservation calculator and included a bill insert to alert its customers about the availability of these tools.

The company states that it enhanced its efforts to promote online and telephonic audits in 2020. Like the larger IOUs, FPUC began its energy education efforts with changes to the company's website. Through website, social media, and email messaging, the company provided information about suspended conservation programs and offered energy-saving tips. FPUC also provided its customers with links to access their newly updated energy conservation tools, which included cost calculators for appliances and other equipment. In 2020, the company maintained its usual marketing efforts to promote its entire energy conservation portfolio through bill messaging and print advertising (including billboards and banners) in its service territories.

JEA and OUC

JEA and OUC suspended programs in March that involved utility personnel entering customer homes, and both entities used websites and social media accounts for communicating with customers about conservation programs.

While both utilities offered virtual audits, OUC offered on-site audits whereby conservation specialists remained outdoors during the audits, using video-conferencing tools to give guidance to its customers. OUC expressed that its modified audit program obviated the need to create waitlists that would have otherwise been necessary if the utility had fully suspended the program.

3.3 Information on Audit Programs

Residential energy audits are required by Section 366.82(11), F.S. Energy audits serve as an avenue for utilities to identify and evaluate conservation opportunities for customers. FEECA utilities use energy audits as a gateway to their other DSM programs. For example, some rebate programs require customers to have an energy audit so that the utility can identify existing equipment to determine program eligibility before the customer is eligible to participate. Utilities also use energy audits to educate customers on behavioral changes and energy efficiency investments they can make outside of the utility-sponsored DSM programs.

Rule 25-17.0021, F.A.C., requires that all FEECA utilities offer a Walk-Through Audit, a Building Energy-Efficiency Rating System (BERS) Audit, and a Computer-Assisted Audit to their residential customers. All FEECA electric utilities offer Walk-Through audits for their commercial customers as well. In addition to the required audits, FEECA utilities also offer online and phone audits which have become increasingly popular with customers. While online and phone audits are not as thorough as Walk-Through audits, they give customers access to much of the same information on their own time, without the need to schedule appointments with their utility. These audits also typically have lower administrative costs than Walk-Through audits.

As a part of its goalsetting process, PGS was granted a waiver which exempts the company from the requirement to offer Walk-Through audits. The Commission allowed PGS to offer an electronic, online-only audit in lieu of on-site audits for residential customers. In April 2020, PGS launched its Residential Customer Assisted Audit program, as an online audit program for residential customers, and offered 4,878 audits to residential customers. In the third quarter of 2021, PGS updated staff on the delay in its plans to launch its Commercial Walk-Through Energy Audit program.

Residential Audits

The FEECA electric utilities performed a total of 223,146 residential audits in 2020, as shown in Table 9 below.²⁷ On various dates in 2020, the FEECA electric utilities suspended and later reinstated employee visits to customers’ homes and businesses. As a result, during the suspension periods, the utilities were not able to offer Walk-Through, BERS, and Computer-Assisted audits since these types of audits require a utility auditor to physically inspect the customer’s premises. The FEECA electric utilities responded to these suspensions by offering virtual energy audits via online or telephonic audit programs.

**Table 9
Residential Audits by Type in 2020**

Utility	In-Person	Virtual		Total
	Walk-Through, BERS, and Computer-Assisted	Online	Phone	
FPL	3,786	80,940	18,921	103,647
DEF	9,525	11,558	10,477	31,560
TECO	1,514	59,323	443	61,280
Gulf	135	11,764	106	12,005
FPUC	23	0	60	83
JEA	3,187	9,924	0	13,111
OUC	1,296	164	0	1,460
Total	19,446	173,673	30,027	223,146

Source: FEECA utilities’ demand-side management annual reports.

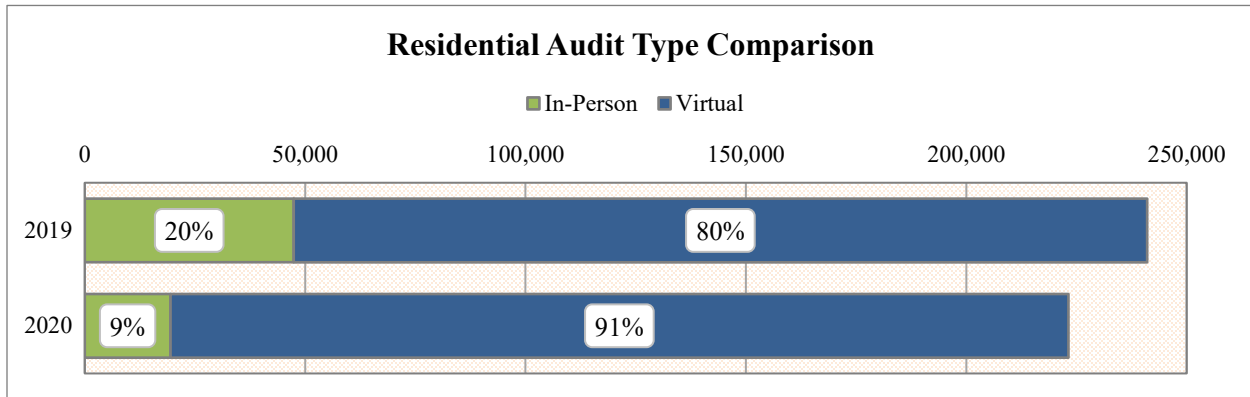
The 2020 total number of residential audits for all electric FEECA utilities, 223,146, was almost 18,000 fewer audits than the 241,025 audits conducted in 2019. In 2020, FPL, Gulf, TECO, FPUC, and the municipal utilities all reported that fewer audits overall were conducted, compared to 2019. However, overall participation for DEF increased by over 8 percent in 2020, when a total of 31,560 audits were conducted.²⁸

²⁷Walk-Through, BERS, and Computer-Assisted audits all require a utility auditor to physically inspect the customer’s premises, and therefore are consolidated for the purposes of Figures 3 and 4.

²⁸In 2019, DEF reported a total of 29,133 audits, including 13,754 Walk-Through, BERS, and Computer Assisted audits, 5,596 Online audits, and 9,783 Phone audits. Despite fewer in-person audits in 2020, DEF more than doubled the number of Online audits that year.

In 2019, approximately 80 percent of all residential audits were conducted virtually, and the balance were conducted in person. For 2020, not only did the overall number of audits decline, but a proportional shift was observed as well. As Figure 3 below shows, a higher proportion of residential audits were conducted virtually in 2020 (91 percent), while far fewer in-person audits were conducted, as expected due to the suspension of onsite audits.

**Figure 3
Residential Audits in 2019 and 2020**



Source: FEECA utilities' demand-side management annual reports.

Commercial / Industrial Audits

The FEECA electric utilities also performed 6,071 commercial energy audits in 2020, down from 8,506 in 2019. As with the residential audit programs, the suspension of on-site visits during 2020 contributed significantly to the lower overall numbers reported by all of the FEECA electric utilities. However, suspending on-site visits had a greater impact on the C/I sector than the residential sector, since some of the FEECA electric utilities only offered in-person audits to the C/I sector. In 2019, FPUC conducted 19 audits for the C/I sector, but conducted no audits in 2020. FPL and Gulf had previously offered other types of audits (e.g. online and/or telephonic audits) to this sector in 2019, and continued offering such audits in 2020. In 2020, DEF offered telephonic audits for the first time to the C/I sector. Table 10 shows a breakdown of the participation numbers in 2020.

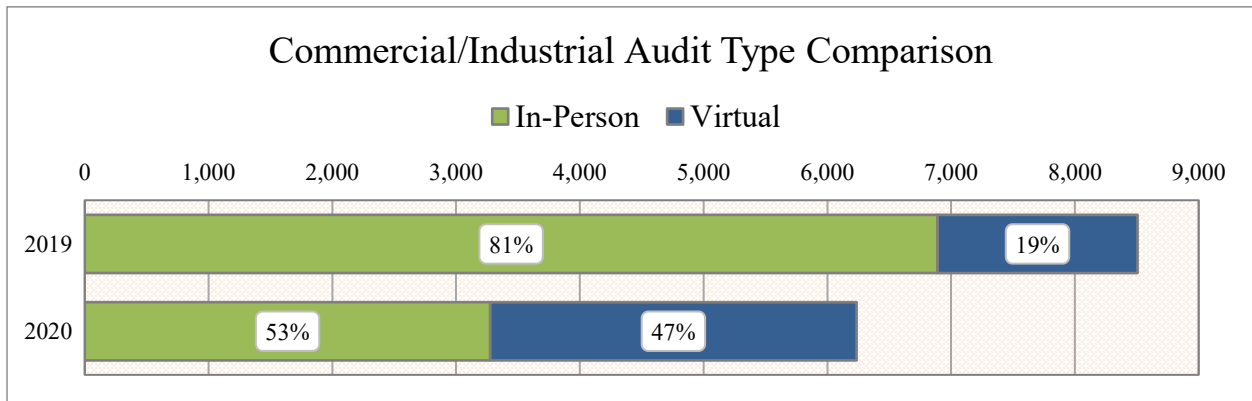
**Table 10
Commercial / Industrial Audits by Type in 2020**

Utility	In-Person	Virtual		Total
	Walk-Through, BERS, and Computer-Assisted	Online	Phone	
FPL	2,464	1,230	1,321	5,015
DEF	363	0	66	429
TECO	238	0	171	409
Gulf	17	6	0	23
FPUC	0	0	0	0
JEA	142	0	0	142
OUC	53	0	0	53
Total	3,277	1,236	1,558	6,071

Source: FEECA utilities' demand-side management annual reports.

Similar to the observations from the residential sector, the suspension of in-person audits for periods in 2020 resulted in a proportional shift between virtual and in-person audits. Figure 4 below shows a higher proportion of C/I audits were conducted virtually in 2020, while far fewer in-person audits were conducted.

**Figure 4
Commercial / Industrial Audits in 2019 and 2020**



Source: FEECA utilities' demand-side management annual reports.

3.4 Low-Income Programs

The 2014 DSM Goals Order²⁹ states, “When the FEECA utilities file their DSM implementation plans, each plan should address how the utilities will assist and educate their low-income customers, specifically with respect to the measures with a two-year or less payback.”³⁰ In accordance with this Order, each electric FEECA utility has implemented programs within its DSM plan that address low-income conservation. Low-income customer participation in energy conservation programs furthers the intent of FEECA by encouraging potential demand and energy reduction in the State of Florida. Customers that participate in these programs benefit through increased knowledge of conservation opportunities and through rebates on energy saving equipment, resulting in potential bill reduction.

Low-income programs mainly focus on efforts to provide energy efficiency information, weatherization opportunities and the installation of energy efficient measures to residential homes. In many cases, the utilities have established partnerships with government and non-profit agencies. They work together to help identify low-income neighborhoods and educate customers on conservation opportunities through energy audits, bill inserts, presentations, and other measures.

Since 2015, all of the electric FEECA utilities have submitted programs in their DSM plans tailored to offer assistance to qualifying customers. Each FEECA utility’s conservation efforts with respect to low-income customers during 2020 are discussed below.

FPL

In 2020, FPL provided assistance to low-income customers through the Low-Income DSM program, which provides direct installation of energy saving measures through government designated Weatherization Assistance Providers. A thorough home energy survey with customer specific recommendations for saving energy is also offered with this program. Although on-site, in-home energy surveys were suspended between March and October 2020 due to COVID-19, FPL offered participants the option of doing the home energy survey over the phone or online.

DEF

DEF uses a variety of marketing channels to promote its conservation programs to all customers, including low-income customers. These channels include bill stuffers, emails, direct mail, social media and information published on the company’s website.

In 2020, DEF worked with local government social service agencies, including Pinellas County Urban League, Mid-Florida Community Services, Capitol Area Community Action Agency and other organizations to ensure these entities are aware of the benefits available to low-income customers. For much of 2020, COVID-19 related concerns prompted DEF to suspend offering in-home direct installations of measures in customers’ homes. Safety related concerns also impacted the social service agencies DEF partnered with, although in 2021 these agencies have

²⁹The 2014 DSM Goals Order references electric utilities only.

³⁰Order No. PSC-14-0696-FOF-EU, issued December 16, 2014, in Docket Nos. 20130199-EI through 20130205-EI, *In re: Commission review of numeric conservation goals*.

resumed activity and have submitted some applications for rebates through DEF's Weatherization Program.

In July 2021, DEF petitioned the Commission to request approval for several modifications to the company's DSM Plan and standards.³¹ The modifications are intended to provide both short-term and long-term relief to low income customers. The Commission is scheduled to consider the DEF pleading in December 2021.

TECO

In 2020, TECO continued its multi-pronged approach for communicating with all customers, including low-income customers. TECO used social media (Facebook and Twitter) posts to announce details for offering its Neighborhood Weatherization Program.

Additionally, TECO recognized that work-from-home directives would impact an increased number of its residential customers, including low-income customers. The company responded by developing a series of seven energy conservation videos that were launched on social media outlets to offer energy savings tips. These videos feature topics that range from water heating to HVAC maintenance. Two specific videos promoted the benefits of weatherization kits and participating in a telephonic energy audit. Another video, "Energy Efficiency Tips for Summer," was offered for Spanish language viewers. The company's Communications office also issued several press releases in 2020 which offered tips and guidance on such topics as working from home, operating costs for common appliances, holiday lighting, and energy efficient cooking practices.

Gulf

In 2020, Gulf engaged in several initiatives to ensure low-income customers were aware of and had access to conservation programs. While overall participation was impacted by COVID-19 restrictions, Gulf specifically targeted lower income neighborhoods with its Community Energy Saver (CES) program, a program where company representatives canvas specifically-identified neighborhoods to provide basic energy conservation recommendations as well as installation of conservation measures including energy efficient LED light bulbs and low-flow shower heads.

In addition to the outreach through the CES program, Gulf emailed all customers whose energy usage had significantly increased from the prior year to offer energy saving tips and bill assistance. Gulf also ran an advertising campaign on local TV, digital channels and social media channels during some of the warmest summer months to encourage customers to identify more ways to save energy and money through the online energy checkup tool.

FPUC

In 2020, FPUC continued to serve its customers, including low-income customers, through its Energy Expert program, which provides energy-related tips, advice, articles, videos, blog content, and other downloadable materials. This energy conservation resource features an "Ask the Energy Expert" tool which allows customers to submit energy-related questions to the

³¹See Docket No. 20210121-EG, *Petition for Approval of Modifications to Demand-side Management Program Plan and Participation Standards*.

company and receive a direct response from FPUC personnel. These questions and answers are also made available on the FPUC website so that other customers may benefit from the information. As part of the Energy Expert program, FPUC energy conservation professionals continuously interact with employees from other departments to provide basic energy efficiency and conservation training. This training helps customer service, sales, and other customer-facing employees address high-bill complaints and to effectively communicate with customers regarding their energy usage, and FPUC's energy conservation measures and programs.

JEA

As in prior years, JEA provided a specific program for low-income customers called its Neighborhood Energy Efficiency Program. This program included free installation of conservation products and provides energy education packets that give customers energy-saving ideas and information about JEA's other DSM programs. JEA also provided speakers from its Ambassador Team to give a "Savings Without Sacrifice" presentation to neighborhood associations, churches, schools, community development groups, and other organizations in low-income neighborhoods. JEA held regular meal events with leaders of multiple advocacy groups for low-income customers, seniors, and disabled persons to keep these leaders aware of utility programs, changes, and resources.

OUC

In 2020, OUC continued its Project Care and Efficiency Delivered programs to reach low-income customers. Project Care assists customers in paying their energy bills and implementing energy efficiency measures. OUC donates \$2 for every \$1 donated to the program. In 2020, OUC added more measures and increased the cap for the Efficiency Delivered program, whereby OUC pays for 85 percent of the costs for energy and water efficiency upgrades up to a cap of \$2,500 per installation. Income qualified participants pay the remaining 15 percent over the first 24 months, interest free.

In addition, OUC partners with the City of Orlando to conduct neighborhood meetings in low-income communities. These meetings promote all low-income programs and offer information on energy conservation education and utility-sponsored audit programs.

3.5 Investor-Owned Utility Research and Development Programs

In addition to specific DSM programs that provide measurable demand and energy savings, the five electric IOUs conduct conservation research and development initiatives to evaluate emerging DSM opportunities. In these programs, Florida's electric IOUs often partner with universities or established industry research organizations. With the arrival of new electricity-consuming products and new technologies, research and development by Florida's electric IOUs creates opportunities to identify emergent options to conserve electricity. The recent initiatives undertaken by the electric IOUs are discussed below.

FPL

In 2020, FPL continued researching conservation-related topics with the engineering departments of several Florida universities, in addition to continuing its work with the Electric Power Research Institute (EPRI). Through these initiatives, FPL and its research partners

participated in larger research projects with other utilities, which is a cost-effective strategy to gain insights at a lower cost than performing similar research on a stand-alone basis. In 2020, FPL began a research initiative exploring the use of Smart Thermostats and related devices for potential application as demand response technologies. Observations are projected to continue through 2021 and into 2022. FPL did not produce any final reports in 2020.

DEF

DEF continued research projects with the University of South Florida and University of Central Florida to gain insights into energy storage. The company hopes to use the results of this research for design of a potential cost-effective demand response program. DEF also engaged in research to study electric vehicle charging, and continued its research on CTA-2045 Technology, a port that enables connected appliances to receive and execute commands. Like FPL, DEF also continued its work with EPRI and other national partners.

In 2020, DEF launched a pilot to develop software and equipment for a Smart Home Gateway. The Smart Home Gateway would use real-time energy usage data and communications technology to interface with appliance control or similar devices. DEF also launched a pilot aimed at precision temperature measurement and analysis. Under this pilot, data on the performance of HVAC systems, ducts, or the building envelope will be analyzed to assist in-home energy auditors to investigate leaks and other deficiencies that may be the root cause of high bill complaints.

TECO

In 2020, TECO continued several of its battery storage research initiatives with University of South Florida, including a project exploring the use of large commercial electric vehicle lithium-ion batteries to export power to the company's grid during peak times. TECO also continued examining a Commercial Small to Mid-sized Business Online Energy Audit program and researching Home Energy Management Systems, including Heat Pump Water Heaters, in its Energy Planner Program.

In August 2020, the University of South Florida's Center for Urban Transportation Research published a final report (Benefits of Electric Vehicles to Tampa Electric Company) it prepared for TECO. This report is a significant resource to supplement the regulated entity's on-going conservation research and development efforts.

Gulf

Gulf previously reported on completed conservation and research projects, and did not initiate any new projects in 2020.

FPUC

In 2020, FPUC expanded the scope of its Battery Storage Conservation Research and Development (CRD) project by adding additional participants and technology providers. This research explores the impacts battery technology has on FPUC's electrical system, comparing data from stand-alone battery units to various configurations that combine solar and battery components. The research is intended to provide the company with data and insights for determining appropriate business model design and regulatory structure for a (future) DSM

program offering for residential customers. In addition to evaluating how the equipment performs, the project also monitors customer acceptance and experience with the technology.

FPUC expects to continue this study through 2021, with plans to provide a final report on this research in March 2022.

Section 4. Conservation Cost Recovery

Florida's IOUs are allowed to recover reasonable expenses for Commission-approved DSM programs through cost recovery clauses. For electric IOUs, the recovery mechanism is the ECCR clause. For natural gas LDCs, the recovery mechanism is the Natural Gas Conservation Cost Recovery (NGCCR) clause. These costs include utility expenses such as administrative costs, equipment, and incentive payments to customers. Before requesting recovery of costs through the ECCR clause, an electric IOU must provide data on DSM program cost-effectiveness. The Commission conducts a financial audit each year prior to approving cost recovery of these expenses.

4.1 Electric IOU Cost Recovery

From 2010 through 2014, annual electric utility expenditures to fund conservation programs grew due to additions and modifications of these programs. However, annual costs recovered from customers through the ECCR clause after 2014 have declined for most IOUs, due to DSM program modifications designed to meet the Commission's 2014 goals. Table 11 shows the annual DSM expenditures recovered by Florida's IOUs from 2011-2020.

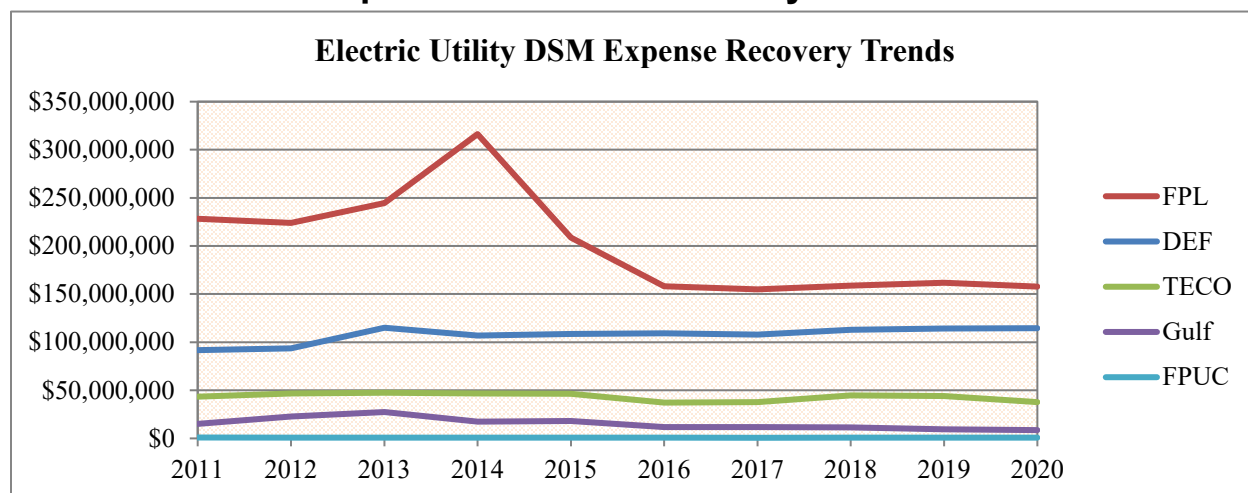
Table 11
DSM Expenditures Recovered by IOUs

	FPL	DEF	TECO	Gulf	FPUC	Total
2011	\$228,293,640	\$91,738,039	\$43,349,092	\$15,003,596	\$954,297	\$379,338,664
2012	\$224,033,738	\$93,728,110	\$46,593,831	\$22,885,826	\$695,235	\$387,936,740
2013	\$244,443,534	\$115,035,455	\$47,502,652	\$27,431,962	\$806,698	\$435,220,301
2014	\$316,311,166	\$107,033,335	\$46,620,508	\$17,412,618	\$772,612	\$488,150,239
2015	\$208,643,788	\$108,455,141	\$46,516,401	\$17,961,885	\$718,616	\$382,295,831
2016	\$158,174,787	\$109,155,438	\$37,242,148	\$11,915,459	\$687,590	\$317,175,422
2017	\$154,916,595	\$107,890,962	\$37,585,598	\$11,854,558	\$640,996	\$312,888,709
2018	\$158,735,829	\$112,863,333	\$44,558,717	\$11,399,250	\$656,154	\$328,213,283
2019	\$161,738,898	\$114,084,224	\$43,988,528	\$9,607,262	\$865,843	\$330,284,755
2020	\$157,892,907	\$114,692,900	\$37,850,526	\$8,637,394	\$782,143	\$319,855,870
Total						\$3,717,351,379

Source: Docket Nos. 20120002-EG through 20210002-EG, Schedules CT-2 from the IOUs' May testimony.

Figure 5 shows trends in annual DSM expenditures for the five electric IOUs from 2011 to 2020.

**Figure 5
DSM Expenditures Recovered by Electric IOUs**



Source: Docket Nos. 20120002-EG through 20210002-EG, Schedules CT-2 from the IOUs' May testimony.

*FPL's 2014 recovery included a one-time \$56.3 million payment to Solid Waste Authority of Palm Beach County.

During the annual ECCR clause proceedings, the Commission approves the ECCR factors, by customer class, which each utility will apply to the energy and demand portions of customer bills. These factors are set using each IOU's estimated conservation costs for the next year and reconciliation for any actual conservation cost over- or under-recovery amounts associated with the current and prior years.

In November 2021, the Commission set the ECCR factors for the 2022 billing cycle. Table 12 illustrates the approved ECCR factors and the monthly bill impact for a residential customer. For illustrative purposes, these factors are applied to a monthly residential bill based on 1,000 kilowatt-hour (kWh) per month energy usage.

**Table 12
Residential Energy Conservation Cost Recovery Factors in 2022**

Utility*	ECCR Factor (Cents per kWh)	Monthly Bill Impact (Based on usage of 1,000 kWh)
FPL/Gulf**	0.134	\$1.34
DEF	0.283	\$2.83
TECO	0.236	\$2.36
FPUC	0.134	\$1.34

Source: Order No. PSC-2021-0427-FOF-EG, Docket No. 20210002-EG.

*While JEA and OUC fall under FEECA Statute, the Commission does not regulate electric rates for municipal utilities.

**On January 1, 2021, Gulf legally merged with and into FPL, and FPL and Gulf will be operationally and functionally integrated in 2022. A consolidated ECCR factor for FPL/Gulf was approved by the Commission in Order No. PSC-2021-0427-FOF-EG.

4.2 Natural Gas Cost Recovery

Commission Rule 25-17.015, F.A.C., establishes a mechanism for recovery of reasonable costs attributed to natural gas conservation programs. While PGS is the only natural gas utility subject to FEECA, the other LDCs covered in this section offer Commission-approved DSM programs without a specific therm savings goal. As it does for the electric IOUs, the Commission also conducts financial audits of the LDCs' conservation expenditures on a yearly basis and adjusts the LDCs' cost recovery factors to allow for recovery of actual and projected program-related costs. Table 13 shows the amounts each LDC recovered in natural gas conservation program expenditures from 2011-2020.

Table 13
DSM Expenditures Recovered by LDCs

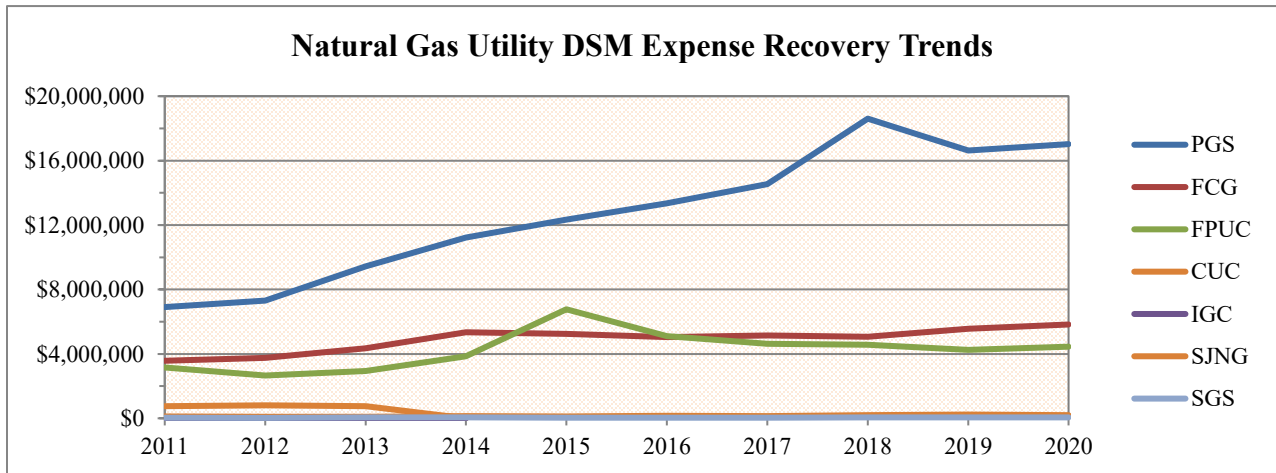
	PGS	FCG	FPUC Consolidated Companies			SJNG	SGS	Total
			Fort Meade	Chesapeake	Indiantown			
2011	\$6,906,668	\$3,573,513	\$3,163,050	\$755,779	\$11,357	\$106,300	\$34,640	\$14,551,307
2012	\$7,314,940	\$3,743,811	\$2,655,654	\$806,747	\$5,238	\$102,425	\$25,090	\$14,653,905
2013	\$9,432,551	\$4,342,603	\$2,935,140	\$742,412	\$10,222	\$96,575	\$53,967	\$17,613,470
2014	\$11,229,211	\$5,343,191	\$3,844,386			\$128,000	\$58,382	\$20,603,170
2015	\$12,335,245	\$5,240,383	\$6,768,175			\$123,400	\$33,563	\$24,500,766
2016	\$13,345,716	\$5,037,863	\$5,098,245			\$156,250	\$36,801	\$23,674,875
2017	\$14,543,555	\$5,149,573	\$4,617,501	*	*	\$144,900	\$42,237	\$24,497,766
2018	\$18,605,532	\$5,067,917	\$4,562,021			\$190,625	\$47,126	\$28,473,221
2019	\$16,619,336	\$5,564,237	\$4,252,769			\$231,600	\$46,184	\$26,714,126
2020	\$17,031,280	\$5,824,651	\$4,447,010			\$189,625	\$52,162	\$27,544,728
Total								\$222,827,334

Source: Docket Nos. 20120004-GU through 20210004-GU, Schedules CT-2 from LDCs' May testimony.

*Spending combined with FPUC.

Figure 6 shows the trends in annual conservation expenditures for all LDCs from 2011 to 2020. In 2013, the Commission approved the LDCs’ Commercial Conservation programs, resulting in additional overall conservation expenditures.³²

Figure 6
DSM Expenditures Recovered by LDCs



Source: Docket Nos. 20120004-EG through 20210004-EG, Schedules CT-2 from the LDCs' May testimony.

*Note that since 2014, DSM expenditures for CUC and IGC were consolidated with FPUC-Fort Meade, and reported as FPUC Consolidated Companies. The graph does not reveal that the amounts for SJNG and SGS are relatively low.

In November 2021, the Commission set the natural gas LDC conservation cost recovery factors for the 2022 billing cycle. Table 14 provides the LDCs’ residential cost recovery factors for 2022 and the impact on a residential customer bill using 20 therms of natural gas per month.

³²Order No. PSC-14-0039-PAA-EG, issued January 14, 2014, in Docket No. 130167-EG, *In re: Petition for approval of natural gas energy conservation programs for commercial customers, by Associated Gas Distributors of Florida*.

**Table 14
Residential Natural Gas Conservation Cost Recovery Factors in 2022**

Utility	Cost Recovery Factor (Cents per Therm)	Monthly Bill Impact (Based on usage of 20 Therms)
PGS	13.116	\$2.62
FCG	27.057	\$5.41
FPUC – Fort Meade	8.627	\$1.73
Chesapeake	14.627	\$2.93
Indiantown	8.395	\$1.68
SJNG	34.498	\$6.90
SGS	20.867	\$4.17

Source: Order No. PSC-2021-0422-FOF-GU, Docket No. 20210004-GU.

Section 5. Educating Florida’s Consumers on Conservation

5.1 Commission Consumer Education Outreach

While the Commission has statutory authority to require conservation efforts by regulated utilities, as part of the agency’s outreach program, the Commission complements utility efforts with its own conservation-related activities. To effectively reach as many consumers as possible, the Commission’s consumer education program uses a variety of platforms to share conservation information, including the Commission website, public events, brochures, press releases, E-Newsletters, and Twitter. Conservation information is also available through other governmental and utility websites. Section 5.2 lists related websites for state and federal agencies, investor owned electric utilities, and local gas distribution companies to further assist consumers. Most of the data in this section covers October 2020 through August 2021.

Triple E Award

Each quarter, the Commission recognizes a small business for implementing Commission approved, cost-effective conservation programs. Covering the state’s five major geographic areas, the Commission presents its Triple E Award—for Energy Efficiency Efforts—to a local business that has accomplished superior energy efficiency by working with its local utility to help reduce its energy footprint. Triple E Award recipients receive an award plaque, are featured and archived under Hot Topics on the FPSC homepage—www.FloridaPSC.com—and are highlighted statewide via a press release and on Twitter (@floridapsc).

Website Outreach Resources

The PSC invites consumers to visit its website to find an assortment of information to help save energy. According to Google Analytics, website page views for October 1, 2020 through August 27, 2021 totaled over 1.1 million. *Find Your Utility* and *Lifeline Assistance* pages were among the most popular FPSC Consumer Assistance pages.

The Commission offers several energy conservation brochures and other helpful free resources. Brochures may be viewed and printed directly from the website, FloridaPSC.com/publications, ordered online, or requested by mail or phone. From October 2020 through August 12, 2021, the FPSC received more than 18,548 requests for brochures.

Newsletters

The Commission’s quarterly [Consumer Connection E-Newsletter](#) features current energy and water conservation topics, consumer tips, and general Commission information. Consumer tips and information highlighted through video and text during the reporting period include: Chairman Gary Clark’s consumer message for National Consumer Protection Week, Hurricane Preparedness, and Conservation Strategies while Sheltering at Home. The Consumer Connection E-Newsletter is available under Consumer Corner on the Commission’s homepage and distributed to consumers via Twitter (@floridapsc) and by subscribing to the free [newsletter](#) online.

National Consumer Protection Week

National Consumer Protection Week (NCPW), highlighting consumer protection and education efforts, was instrumental to the Commission’s 2021 conservation education efforts. Chairman

Gary Clark recognized the 23rd Annual NCPW (February 23-March 6, 2021) with a consumer message on the importance of education and awareness about utility services and about avoiding scams targeting utility customers.

Even during the pandemic, the PSC strives to keep consumers engaged. Many of the senior and community centers the PSC regularly visit remain temporarily closed, with in-person events cancelled. For NCPW 2021, the PSC partnered with coordinators at the Tallahassee Senior Center and Foundation to deliver and distribute information to seniors and answer questions via their “*Learn and Wave*” events. For 14 years, the FPSC has joined government agencies, advocacy organizations, and private sector groups nationwide to highlight NCPW.

Older Americans Month

Each May, the Commission participates in Older Americans Month, a national project to honor and recognize older Americans for their contributions to families, communities, and society. “Communities of Strength” was the theme for Older Americans Month 2021. Due to pandemic restrictions, instead of in-person events, the PSC partnered with staff coordinators at five senior centers in Broward, Palm Beach and Washington Counties to deliver and distribute information to area seniors.

Energy Awareness Month

Each October, the U.S. Department of Energy (DOE) sponsors National Energy Awareness Month to promote smart energy choices and highlight economic and job growth, environmental protection, and increased energy independence. In 2020, as consumers spent more time at home, average home electricity usage increased. The Commission encouraged consumers to use *Conservation at Home*, using our [Conservation House](#) and other PSC information to provide energy saving tips during the month.

Also during the month of October, the PSC recognized the annual “*Imagine a Day Without Water,*” a national Value of Water Campaign on October 21. Produced a few years ago, PSC Commissioners and Executive Director participated in a “*Water Walk*” video with each imaging how a day without water would affect a typical neighborhood. The video’s message is still relevant and was highlighted and distributed in a press release.

Community Events

FPSC Commissioners are active in communities around the state and regularly present energy conservation information to students at area schools, to seniors and low-income residents at local community centers, and to county and city businesses at meetings or other events. Through ongoing partnerships with governmental entities, consumer groups, and many other service organizations, the Commission regularly distributes energy and water conservation materials. The Commission also actively seeks new community events, venues, and opportunities where conservation materials can be distributed and discussed with consumers. Although outreach events were suspended during the 2020-2021 reporting period, Commissioners are looking forward to public events resuming in the future.

Hearings and Customer Meetings

As an ongoing outreach initiative, the Commission supplies conservation brochures to consumers at Commission service hearings and customer meetings across the state. From October 2020 through August 2021, the FPSC's service hearings and customer meetings were held virtually. While educational opportunities with consumers were limited, those participating in virtual customer meetings received an FPSC Rate Case Overview that explains their energy or water utility's bill change request. Customers' questions were answered by Commission outreach staff, who also helped them find useful information on the FPSC website.

Library Outreach Campaign

Each August, the Commission provides educational packets, including conservation materials, to Florida public libraries across the state for consumer distribution. The Commission's Library Outreach Campaign reached 615 state public libraries and branches in 2021. To reduce mailing and production costs, the Commission's 2021 campaign included a cover letter, book marks, and a consumer-friendly brochure order form. Following the Campaign, the FPSC filled many libraries' brochure order requests.

Media Outreach

News releases are posted to the website and distributed via email and Twitter on major Commission decisions, meetings, and public events. The Office of Consumer Assistance & Outreach also issues news releases urging energy conservation during annual recognitions, such as Energy Awareness Month and NCPW. Water conservation was highlighted in March with a release on the federal government's Fix a Leak Week, offering easy repairs to save valuable water and money. For May's National Drinking Water Week, the FPSC reminded consumers to conserve water.

Youth Education

The Commission emphasizes conservation education for Florida's young consumers. During 2020 and 2021, the Commission continued to produce its student resource booklet, Get Wise and Conserve Florida!, to teach children about energy and water conservation. The booklet is promoted to all public libraries through the Library Outreach Programs, is available at all Commission outreach events, and continues to be a favorite during senior events.

5.2 Related Websites

State Agencies and Organizations

Florida Public Service Commission – <http://www.floridapsc.com/>

Florida Department of Environmental Protection – <http://www.dep.state.fl.us>

The Office of Energy – <https://www.fdacs.gov/Divisions-Offices/Energy>

Florida Solar Energy Center – <https://energyresearch.ucf.edu/>

Florida Weatherization Assistance – <https://www.benefits.gov/benefit/1847>

Florida's Local Weatherization Agencies List – <https://floridajobs.org/community-planning-and-development/community-services/weatherization-assistance-program/contact-your-local-weatherization-office-for-help>

U.S. Agencies and National Organizations

U.S. ENERGY STAR Program – <https://www.energystar.gov/>
U.S. Department of Energy – Energy Efficiency and Renewable Energy
Information <http://www.eere.energy.gov/>
National Energy Foundation – <https://nefl.org/>

Florida's Utilities Subject to FEECA

Florida Power & Light Company – <http://www.fpl.com/>
Duke Energy Florida, LLC – <http://www.duke-energy.com/>
Tampa Electric Company – <http://www.tampaelectric.com/>
Gulf Power Company – <http://www.gulfpower.com/>
Florida Public Utilities Company – <http://www.fpuc.com/>
JEA – <http://www.jea.com/>
Orlando Utilities Commission – <http://www.ouc.com/>
Peoples Gas System – <http://www.peoplesgas.com/>

Florida's Investor-Owned Natural Gas Utilities

Florida City Gas – <http://www.floridacitygas.com/>
Florida Division of Chesapeake Utilities – <http://www.chpk.com/companies/chesapeake-utilities/>
Florida Public Utilities Company – <http://www.fpuc.com/>
Florida Public Utilities Company – Ft. Meade Div. – <http://www.fpuc.com/fortmeade/>
Florida Public Utilities Company – Indiantown Div. – <http://www.fpuc.com/about/fpufamily>
Peoples Gas System – <http://www.peoplesgas.com/>
Sebring Gas System – <http://www.sebringgas.com/>
St. Joe Natural Gas Company – <http://www.stjoenaturalgas.com/>

Appendix A. 2020 FEECA Utility Conservation Programs

Electric IOUs

Florida Power & Light Company	
Residential Programs	Residential Home Energy Survey Residential Ceiling Insulation Residential Load Management (On Call®) Residential Air Conditioning Residential New Construction (BuildSmart®) Residential Low-Income Weatherization
Commercial/Industrial Programs	Business On Call® Business Lighting Commercial/Industrial Load Control (CILC) Commercial/Industrial Demand Reduction (CDR) Business Energy Evaluation (BEE) Business Heating, Ventilating, and Air Conditioning (HVAC) Business Custom Incentive (BCI)
Other	Conservation Research and Development (CRD) Cogeneration & Small Power Production

Duke Energy Florida, LLC	
Residential Programs	Home Energy Check Residential Incentive Low-Income Weatherization Assistance Program Neighborhood Energy Saver Residential Load Management
Commercial/Industrial Programs	Business Energy Check Better Business Commercial Custom Incentive Interruptible Service Curtable Service Standby Generation Commercial Energy Management
Other	Technology Development Qualifying Facility

Tampa Electric Company	
Residential Programs	<ul style="list-style-type: none"> Residential Energy Audits Residential Ceiling Insulation Residential Duct Repair Residential Electronically Commutated Motors (ECM) Energy Education, Awareness, and Agency Outreach ENERGY STAR Multi-Family ENERGY STAR for New Homes ENERGY STAR Pool Pumps ENERGY STAR Thermostats Residential Heating and Cooling Neighborhood Weatherization (Low-Income) Residential Price Responsive Load Management (Energy Planner) Residential Prime Time Plus (Residential Load Management) Residential Wall Insulation Residential Window Replacement
Commercial/Industrial Programs	<ul style="list-style-type: none"> Commercial/Industrial Energy Audits Commercial Ceiling Insulation Commercial Chiller Cogeneration Conservation Value Commercial Cool Roof Commercial Cooling Demand Response Commercial Duct Repair Commercial Electronically Commutated Motors (ECM) Industrial Load Management (GSLM 2&3) Facility Energy Management System Street and Outdoor Lighting Conversion Lighting Conditioned Space Lighting Non-Conditioned Space Lighting Occupancy Sensors Commercial Load Management Commercial Smart Thermostats Standby Generator Variable Frequency Drive for Compressors Commercial Water Heating
Other	<ul style="list-style-type: none"> Conservation Research and Development Integrated Renewable Energy System Pilot Program Renewable Energy (Sun to Go)

Gulf Power Company	
Residential Programs	Residential Energy Audit and Education Community Energy Saver (Low-Income) Residential Custom Incentive HVAC Efficiency Residential Building Efficiency Energy Select Residential HVAC Residential Ceiling Insulation Residential High Efficiency Pool Pump Residential Time of Use Rate Pilot
Commercial/Industrial Programs	Commercial/Industrial Energy Analysis Commercial HVAC Retrocommissioning Commercial Building Efficiency Commercial/Industrial Custom Incentive Business HVAC Critical Peak Option Curtable Load
Other	Conservation Demonstration and Development

Florida Public Utilities Company	
Residential Programs	Residential Energy Survey Residential Heating and Cooling Efficiency Upgrade
Commercial/Industrial Programs	Commercial Energy Consultation Commercial Heating and Cooling Efficiency Upgrade Commercial Reflective Roof Commercial Chiller Upgrade
Other	Low-Income Energy Outreach Conservation Demonstration and Development

Electric Municipal Utilities

JEA	
Residential Programs	Residential Energy Audit Residential Solar Water Heating Neighborhood Efficiency (Low-Income) Residential Efficiency Upgrade Energy Efficient Products Residential New Build MyWay Prepaid Program Residential Distributed Generation and Battery Rebate Program
Commercial/Industrial Programs	Commercial Energy Audit Commercial Prescriptive Lighting Program Commercial Prescriptive Small Business Direct Install Custom Commercial Commercial Distributed Generation and Battery Rebate Program

Orlando Utilities Commission	
Residential Programs	Residential Home Energy Survey Residential Duct Repair/Replacement Rebate Residential Ceiling Insulation Upgrade Rebate Residential Window Film/Solar Screen Rebate Residential High-Performance Windows Rebate Residential Efficient Electric Heat Pump Rebate Residential New Home Rebate Residential Efficiency Delivered (Low-Income)
Commercial/Industrial Programs	Commercial Energy Survey Commercial Efficient Electric Heat Pump Rebate Commercial Duct Repair Rebate Commercial Window Film/Solar Screen Rebate Commercial High-Performance Windows Rebate Commercial Ceiling Insulation Rebate Commercial Cool/Reflective Roof Rebate

Natural Gas LDC

Peoples Gas System	
Residential Programs	Residential Customer Assisted Energy Audit Residential New Construction Residential Appliance Retention Residential Appliance Replacement Oil Heat Replacement
Commercial/Industrial Programs	Commercial Walk-Through Energy Audit Commercial Electric Replacement Commercial New Construction Commercial Retention Commercial Replacement Commercial Gas Space Conditioning Small Package Cogeneration
Other	Monitoring and Research Conservation Demonstration and Development

Appendix B. 2020 FEECA Utility Conservation Program Descriptions

Electric FEECA IOUs

A. Florida Power & Light Company

Residential Programs

- **Residential Home Energy Survey**
The Residential Home Energy Survey Program educates customers on energy efficiency and encourages implementation of recommended energy efficiency measures, even if they are not included in FPL's DSM programs. The Residential Home Energy Survey Program is also used to identify potential candidates for other FPL DSM programs. FPL offers in-home, phone-assisted, and online audits for its residential customers.
- **Residential Ceiling Insulation**
The Residential Ceiling Insulation Program encourages customers to improve their homes' thermal efficiency.
- **Residential Load Management (On Call)**
The Residential Load Management Program allows FPL to turn off certain customer-selected appliances using FPL-installed equipment during periods of extreme demand, capacity shortages, or system emergencies.
- **Residential Air Conditioning**
The Residential Air Conditioning Program encourages customers to install high-efficiency central air conditioning systems.
- **Residential New Construction (BuildSmart[®])**
The Residential New Construction Program encourages builders and developers to design and construct new homes that achieve BuildSmart[®] certification and move towards ENERGY STAR[®] qualifications.
- **Residential Low-Income Weatherization**
The Residential Low-Income Weatherization Program assists low-income customers through state Weatherization Assistance Provider (WAP) agencies and FPL-conducted Energy Retrofits.

Commercial/Industrial Programs

- **Business On Call®**
The Business On Call® Program allows FPL to turn off customers' direct expansion central air-conditioning units using FPL-installed equipment during periods of extreme demand, capacity shortages, or system emergencies.
- **Business Lighting**
The Business Lighting Program encourages customers to install high-efficiency lighting systems.
- **Commercial/Industrial Load Control (CILC)**
The Commercial/Industrial Load Control Program allows FPL to control customer loads of 200 kW or greater during periods of extreme demand, capacity shortages, or system emergencies. The CILC Program was closed to new participants as of 2000, but is available for existing participants who entered into a CILC agreement as of March 1996.
- **Commercial/Industrial Demand Reduction (CDR)**
The Commercial/Industrial Demand Reduction Program allows FPL to control customer loads of 200 kW or greater during periods of extreme demand, capacity shortages, or system emergencies. FPL installs a load management device at the customer's facility and provides monthly credits to customers. Unlike the CILC program, the CDR program is still open to new customers.
- **Business Energy Evaluation (BEE)**
The Business Energy Evaluation Program educates customers on energy efficiency and encourages implementation of recommended practices and measures, even if these are not included in FPL's DSM programs. The Business Energy Evaluation is also used to identify potential candidates for other FPL DSM programs. FPL offers the Business Energy Evaluation in on-site or online formats.
- **Business Heating, Ventilating, and Air Conditioning (HVAC)**
The Business HVAC Program encourages customers to install high-efficiency HVAC systems.
- **Business Custom Incentive (BCI)**
The Business Custom Incentive Program encourages customers to install unique high-efficiency technologies not covered by other FPL DSM programs.

Other Programs

- **Conservation Research and Development (CRD) Project**
This project consists of research studies designed to: identify new energy efficient technologies; evaluate and quantify their impacts on energy, demand, and customers; and where appropriate and cost-effective, incorporate an emerging technology into a DSM program.

- **Cogeneration & Small Power Production**

The Cogeneration and Small Power Production Program facilitates the interconnection and administration of contracts for cogenerators and small power producers.

B. Duke Energy Florida, LLC

Residential Programs

- **Home Energy Check**

The Home Energy Check is a residential energy audit program that provides residential customers with an analysis of their energy consumption and educational information on how to reduce energy usage and save money. The Home Energy Check Program is the foundation for other residential demand-side management programs and offers walkthrough, online, phone-assisted, and Home Energy Rating audits for its residential customers. Participants in the program may receive a residential Energy Efficiency Kit that contains energy-saving measures that can be easily installed and utilized by the customer.

- **Residential Incentive**

The Residential Incentive Program provides incentives to residential customers for energy efficiency improvements in both existing and new homes. This includes incentives for measures such as duct testing, duct repair, attic insulation, replacement of windows, high-efficiency heat pump replacing resistance heat, high-efficiency heat pump replacing a heat pump, and newly constructed Energy Star homes.

- **Low-Income Weatherization Assistance Program**

The Low-Income Weatherization Assistance Program works with the Florida Department of Economic Opportunity and local weatherization providers to deliver energy education, efficiency measures, and incentives to weatherize the homes of income-eligible families. DEF assists by providing energy education materials and financial incentives to weatherize the homes of low-income families.

- **Neighborhood Energy Saver**

The Neighborhood Energy Saver Program installs energy conservation measures, identified through an energy assessment, in the homes of customers in selected neighborhoods where at least 50 percent of households have incomes equal to or less than 200 percent of the poverty level established by the U.S. government.

- **Residential Energy Management**

The Residential Energy Management Program is a voluntary program that uses direct control of customer equipment to reduce system demand during winter and summer peak capacity periods by controlling service to select customer appliances.

Commercial/Industrial Programs

- **Business Energy Check**
The Business Energy Check Program is a commercial energy audit program that provides commercial customers with an analysis of their energy usage and information about energy-saving practices and cost-effective measures that they can implement at their facilities.
- **Better Business**
Better Business is an umbrella efficiency program that provides incentives to existing C/I and government customers for HVAC, ceiling and roof insulation upgrades, duct leakage and repair, demand-control ventilation, and cool roof coating.
- **Commercial Custom Incentive Program**
The Florida Custom Incentive Program is designed to encourage C/I customers to make capital investments for energy-efficiency measures which reduce peak demand and provide energy savings. This program provides incentives for projects which are cost-effective but not otherwise addressed through DEF's incentive programs.
- **Interruptible Service**
Interruptible Service is a direct load control program that allows DEF to reduce system demand by interrupting electrical service during times of capacity shortage during peak or emergency conditions. In return, customers receive a monthly bill credit.
- **Curtable Service**
Curtable Service is an indirect load control program that reduces system demand through customer contracts to curtail all or a portion of their electricity demand at times of capacity shortage during peak or emergency conditions. In contrast to the Interruptible Service Program, the customer is able to control whether their appliances are turned off during times of stress on the grid. In return, customers receive a monthly bill credit.
- **Standby Generation**
The Standby Generation Program is a demand control program that allows DEF to reduce system demand by dispatching the customer's standby generator. This is a voluntary program available to C/I customers who have on-site generation capability and are willing to reduce demand on DEF's system when requested for system reliability purposes.
- **Commercial Energy Management**
The Commercial Energy Management Program uses direct control of customer equipment to reduce system demand during winter and summer peak capacity periods. The Commercial Energy Management Program was closed to new participants in 2000, but is still open for existing participants.

Other Programs

- **Technology Development**

The Technology Development Program allows DEF to investigate technologies that support the development of new demand response and energy-efficiency programs. DEF is investigating hardware and software to manage residential loads, the value of long-duration customer-side energy storage systems, precision temperature measurement and analysis, solar resources, and data and patterns related to charging electric vehicles.

- **Qualifying Facilities Program**

This program develops standard offer contracts, negotiates, enters into, amends and restructures nonfirm energy, and firm energy and capacity contracts entered into with qualifying cogeneration, small power producers, and renewable facilities

C. Tampa Electric Company

Residential Programs

- **Residential Energy Audits**

The Residential Energy Audits Program includes a walk-through free energy check, a customer-assisted energy audit, a computer-assisted paid energy audit, and a building energy ratings system (BERS) audit.

- **Residential Ceiling Insulation**

The Residential Ceiling Insulation Program offers rebates to existing residential customers to install additional ceiling insulation in existing homes.

- **Residential Duct Repair**

The Residential Duct Repair Program encourages residential customers to repair leaky duct work of central air conditioning systems in existing homes.

- **Residential Electronically Commutated Motors (ECM)**

The Residential Electronically Commutated Motors Program encourages residential customers to replace their existing HVAC air handler motors with more efficient ECMs.

- **Energy Education, Awareness, and Agency Outreach**

The Energy Education, Awareness, and Agency Outreach Program engages and educates groups of customers and students on energy efficiency in an organized setting. Also, participants receive an energy savings kit with energy saving devices and information.

- **ENERGY STAR for New Multi-Family Residences**

The ENERGY STAR for Multi-Family Residences Program utilizes a rebate to encourage construction of new multi-family residences that meet the requirements to achieve the ENERGY STAR certified apartments and condominiums label.

- **ENERGY STAR for New Homes**
 The ENERGY STAR for New Homes Program incentivizes residential home builders to build homes that qualify for the ENERGY STAR award by achieving energy efficiency levels greater than current Florida building code baseline practices.
- **ENERGY STAR Pool Pumps**
 The ENERGY STAR Pool Pumps Program offers customer rebates for installing high efficiency ENERGY STAR rated pool pumps to help reduce their energy consumption while reducing TECO's weather sensitive peak demand.
- **ENERGY STAR Thermostats**
 The ENERGY STAR Thermostats Program offers customer rebates for installing an ENERGY STAR certified smart thermostat to help reduce their energy consumption while reducing TECO's weather sensitive peak demand.
- **Residential Heating and Cooling**
 The Residential Heating and Cooling Program offers rebates to residential customers for installing high-efficiency heating and cooling equipment in existing homes.
- **Neighborhood Weatherization (Low-Income)**
 The Neighborhood Weatherization Program provides for the installation of energy efficient measures for qualified low-income customers.
- **Residential Price Responsive Load Management (Energy Planner)**
 The Residential Price Responsive Load Management (Energy Planner) Program reduces weather-sensitive loads through an innovative price responsive rate. The price responsive rate encourages residential customers to make behavioral or equipment usage changes by pre-programming HVAC, water heating, and pool pumps.
- **Residential Prime Time Plus (Residential Load Management)**
 The Residential Prime Time Plus (Residential Load Management) is a residential load management program designed to alter the Utility's system load curve by reducing summer and winter demand peaks. Customers participating in Prime Time Plus will receive monthly incentive credits on their electric bill.
- **Residential Wall Insulation**
 The Residential Wall Insulation Program offers rebates to existing residential customers to install additional wall insulation in existing homes.
- **Residential Window Replacement**
 The Residential Window Replacement Program offers rebates to existing residential customers to install window upgrades in existing homes.

Commercial Programs

- **Commercial/Industrial Energy Audits**
In the C/I Energy Audits Program, C/I customers can receive free energy audits or more comprehensive paid energy audits.
- **Commercial Ceiling Insulation**
The Commercial Ceiling Insulation Program incentivizes C/I customers to install additional ceiling insulation in existing commercial buildings.
- **Commercial Chiller**
The Commercial Chiller Program offers rebates to C/I customers for installing high efficiency chiller equipment.
- **Cogeneration**
The Cogeneration Program incentivizes large industrial customers with waste heat or fuel resources to use their onsite energy to avoid fuel waste and install electric generating equipment. The large industrial customers may sell their surplus electric generation to TECO.
- **Conservation Value**
The Conservation Value Program offers rebates to C/I customers to invest in energy conservation measures that are not in other C/I programs.
- **Commercial Cool Roof**
The Commercial Cool Roof Program encourages C/I customers to install a cool roof system above conditioned spaces.
- **Commercial Cooling**
The Commercial Cooling Program encourages C/I customers to install high efficiency direct expansion commercial air conditioning cooling equipment.
- **Demand Response**
The Demand Response Program incentivizes C/I customers to reduce electricity demand at certain peak times.
- **Commercial Duct Repair**
The Commercial Duct Repair Program encourages C/I customers to repair leaky ductwork of central air conditioning systems in existing C/I facilities.
- **Commercial Electronically Commutated Motors (ECM)**
The Commercial Electronically Commutated Motors Program encourages C/I customers to replace air handler motors or refrigeration fan motors with ECMs.
- **Facility Energy Management System**
The Facility Energy Management System Program offers customer rebates for installing a facility energy management system that provides real time operational, production and

energy consumption information which enables the customer to reduce their energy consumption and demand and reducing TECO's peak demand.

- **Industrial Load Management (GSLM 2&3)**

The Industrial Load Management Program incentivizes large industrial customers to allow TECO to interrupt part or all of their electrical service during periods of peak grid stress.

- **LED Street and Outdoor Lighting Conversion**

The Street and Outdoor Lighting Conversion Program is designed to encourage the conversion from Non-Light Emitting Diode ("LED") street and outdoor lighting luminaires to eligible LED luminaires in a five-year program. The goal of this program is to install energy efficient LED street and outdoor lighting technology to reduce the energy consumption and demand and reducing TECO's peak demand.

- **Lighting Conditioned Space**

The Lighting Conditioned Space Program encourages C/I customers to invest in more efficient lighting technologies in existing conditioned areas of C/I facilities.

- **Lighting Non-Conditioned Space**

The Lighting Non-Conditioned Space Program encourages C/I customers to invest in more efficient lighting technologies in existing non-conditioned areas of C/I facilities.

- **Lighting Occupancy Sensors**

The Lighting Occupancy Sensors Program encourages C/I customers to install occupancy sensors to control C/I lighting systems.

- **Commercial Load Management**

The Commercial Load Management Program incentivizes C/I customers to allow TECO to control weather-sensitive heating, cooling, and water heating systems to reduce the associated weather-sensitive peak demand.

- **Refrigeration Anti-Condensate Control**

The Refrigeration Anti-Condensate Control Program encourages C/I customers to install anti-condensate equipment sensors within refrigerated door systems.

- **Commercial Smart Thermostats**

The Commercial Smart Thermostats Program offers customer rebates for installing smart thermostats to help reduce their demand while reducing TECO's weather sensitive peak demand.

- **Standby Generator**

The Standby Generator Program incentivizes C/I customers to use available emergency electrical generation capacity to reduce weather-sensitive peak demand on the grid.

- **Variable Frequency Drive for Compressors**
The Variable Frequency Drive for Compressors Program offers customer rebates for installing variable frequency drives to their new or existing refrigerant or air compressor motors to help reduce their demand while reducing TECO's weather sensitive peak demand.
- **Commercial Water Heating**
The Commercial Water Heating Program encourages C/I customers to install high efficiency water heating systems.

Other Programs

- **Conservation Research and Development (R&D)**
The Conservation Research and Development Program allows TECO to explore DSM measures that have insufficient data on cost-effectiveness and the impact on TECO's ratepayers.
- **Integrated Renewable Energy System**
The commercial/industrial Integrated Renewable Energy System Pilot Program is a five-year pilot program to study the capabilities and DSM opportunities of a fully integrated renewable energy system. The integrated renewable energy system will also be used as an education platform for commercial and industrial customers.
- **Renewable Energy (Sun to Go)**
The Renewable Energy (Sun to Go) Program delivers renewable energy options to TECO's customers through program administration, renewable electricity generation, evaluation of potential new renewable sources, and market research.

D. Gulf Power Company

Residential Programs

- **Residential Energy Audit and Education**
The Residential Energy Audit and Education Program is the primary educational program to help customers improve the energy efficiency of their new or existing home. The program provides energy conservation advice and information that encourages the implementation of efficiency measures and behaviors that result in electricity bill savings. Gulf offers its residential customers in-home and online audits.
- **Community Energy Saver (Low-Income)**
The Community Energy Saver Program installs energy conservation measures in the homes of low-income families at no cost to the customers. The program also educates families on behavioral changes designed to save money by decreasing energy use.

- **Residential Custom Incentive**
 The Residential Custom Incentive Program aims to increase energy efficiency in the residential rental property sector. The program promotes the installation of efficiency measures available through other programs, such as HVAC maintenance and quality installation, high performance windows, reflective roofing, and Energy Star Window A/Cs. As suitable, the program has other incentives to surmount the split-incentive barrier in a landlord/renter situation.
- **HVAC Efficiency Improvement**
 The HVAC Efficiency Improvement Program aims to increase energy efficiency and improve HVAC cooling system performance for new and existing homes. Gulf increases efficiency through HVAC maintenance, duct repair, and HVAC quality installation.
- **Residential Building Efficiency**
 The Residential Building Efficiency Program is an umbrella efficiency program for existing and new residential customers to install eligible equipment such as high-performance windows, reflective roofs, and ENERGY STAR window air conditioners. The goals are to increase customer demand for energy efficient technologies and to create long-term energy savings and peak demand reduction.
- **Energy Select**
 The *Energy Select* Program gives customers a way to manage their energy consumption by programming their heating and cooling systems and major appliances, such as electric water heaters and pool pumps, to respond automatically to prices that vary during the day and by season in relation to Gulf's cost of producing or purchasing energy.
- **Residential HVAC**
 The Residential HVAC Program enables customers to increase energy efficiency and improve HVAC cooling and heating system performance for both new and existing single-family homes by offering an incentive for the installation of a high-efficiency electric heat pump.
- **Residential Ceiling Insulation**
 The Residential Ceiling Insulation program encourages customers to improve their homes' thermal efficiency by providing customers an incentive to install a minimum of R-19 insulation in their existing home.
- **Residential High Efficiency Pool Pump**
 The Residential High Efficiency Pool Pump Program encourages customers to install a high-efficiency pool pump by providing an incentive in both new and existing residential applications.
- **Residential Service Time of Use Pilot**
 The Residential Service Time of Use Pilot Program provides residential customers the opportunity to use customer-owned equipment to respond automatically and take advantage of a variable pricing structure with a critical peak component. The pilot will be offered to 400

residential customers. The goal is to measure customers' response, with customer owned equipment, to a variable electricity price.

Commercial Programs

- **Commercial/Industrial Audit**

The Commercial/Industrial Audit Program provides advice to Gulf's existing C/I customers on how to reduce energy consumption. The program ranges from an Energy Analysis Audit and walk-through surveys to a Technical Assistance Audit and computer programs that simulate options for very large, energy-intensive customers. Gulf offers this audit in the form of an on-site walkthrough.

- **Commercial HVAC Retrocommissioning**

The Commercial HVAC Retrocommissioning program is a process of identifying suboptimal performance in a facility's systems and replacing outdated equipment at a reduced cost for qualifying installations.

- **Commercial Building Efficiency**

The Commercial Building Efficiency Program is an umbrella efficiency program for C/I customers to encourage the installation of high-efficiency equipment in order to reduce energy and demand. The high-efficiency equipment is focused on commercial geothermal heat pumps, ceiling/roof insulation, and reflective roofs.

- **Commercial/Industrial Custom Incentive**

The Commercial/Industrial Custom Incentive Program offers energy efficient end-user equipment to C/I customers, comprehensive audits, design, and construction of energy conservation projects. Covered projects include demand reduction or energy improvement retrofits that are beyond the scope of other DSM programs.

- **Business HVAC**

The Business HVAC Program encourages customers to install high-efficiency HVAC systems including chillers; split/package direct expansion (DX); demand control ventilation (DCV); and energy recovery ventilation (ERV) by offering incentives which will vary according to the size of the systems or ventilation installed.

- **Critical Peak Option**

This program allows customers on Gulf's Large Power Time-of-Use rate schedule an option to receive credits for capacity that can be reduced during peak load conditions. The program provides a fixed, per-kW credit for measured on-peak demand and a charge for any measured demand recorded during a called critical peak event.

- **Curtable Load**

The Curtable Load (CL) Program is available to customers taking service under rate schedules LP, LPT, PX, or PXT and who also execute a Curtable Load Service agreement. The program provides capacity payments for electric load which can be curtailed during certain conditions, and customers must commit a minimum of 4,000 Kw of non-firm load.

Other Programs

- **Conservation Demonstration and Development**

The Conservation Demonstration and Development Program is an umbrella program for the identification, research, development, and evaluation of new or emerging end-use energy efficient technologies.

E. Florida Public Utilities Company

Residential Programs

- **Residential Energy Survey**

In the Residential Energy Survey Program, FPUC offers in-home and online audits which provides the customer with specific whole-house energy efficiency recommendations, a list of blower-door test contractors who can check for duct leakage, and a conservation kit.

- **Residential Heating and Cooling Efficiency Upgrade**

The Residential Heating and Cooling Upgrade Program incentivizes customers operating inefficient heat pumps and air conditioners to replace them with more efficient units.

Commercial Programs

- **Commercial Energy Consultation**

In the Commercial Energy Consultation Program, FPUC energy conservation representatives conduct commercial site visits to assess the potential for applicable DSM programs, educate customers about FPUC's commercial DSM programs, conduct a bill review, offer energy savings suggestions, and inform customers about commercial online resources and tools.

- **Commercial Heating and Cooling Efficiency Upgrade**

The Commercial Heating and Cooling Upgrade Program provides rebates to small commercial customers (customers with a maximum of 5-ton units) if the customers install a high-efficiency central air conditioner or heat pump with a minimum 15 SEER.

- **Commercial Reflective Roof**

The Commercial Reflective Roof Program provides rebates to non-residential customers and contractors who convert or install a new cool roof on existing facilities or on new building construction. The roofing material must be Energy Star Certified.

- **Commercial Chiller Upgrade**

The Commercial Chiller Upgrade Program offers commercial customers who replace existing chillers with a more efficient system, an incentive of up to \$100 per kW of additional savings above the minimum efficiency levels.

Other Programs

- **Conservation Demonstration and Development**
The Conservation Demonstration and Development Program researches energy efficiency and conservation projects to identify, develop, demonstrate, and evaluate promising end-use energy efficient technologies across a wide variety of applications. In 2019, FPUC installed two battery storage systems to improve customer electric system reliability and resiliency, and has extended this study with completion expected in 2021.
- **Low-Income Energy Outreach**
The Low-Income Energy Outreach Program partners with Department of Economic Opportunity approved Low-Income Weatherization Program operators to offer Residential Energy Surveys, host energy conservation events, and distribute conservation materials.

Electric FEECA Municipal Utilities

A. JEA

Residential Programs

- **Residential Energy Audit**
In the Residential Energy Audit Program, utility auditors examine homes, educate customers, and makes recommendations on low-cost or no-cost energy-saving practices and measures.
- **Residential Solar Water Heating**
The Residential Solar Water Heating Program pays a financial incentive to customers to encourage the use of solar water heating technology.
- **Residential Solar Net Metering**
The Residential Solar Net Metering Program promotes the use of PV by purchasing excess electricity from residential customers who have PV.
- **Neighborhood Efficiency (Low-Income)**
The Neighborhood Efficiency Program offers education on the efficient use of energy and water as well as the direct installation of an array of energy and water efficiency measures at no cost to income qualified customers.
- **Residential Efficiency Upgrade**
The Residential Efficiency Upgrade Program provides incentives to encourage the use of high efficiency HVAC and water heating. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.

- **Energy Efficient Products**
The Energy Efficient Products Program provides incentives to encourage the use of high efficiency lighting and efficient appliances. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.
- **Residential New Build**
The Residential New Build Program promotes the use of high efficiency HVAC, water heating, lighting, and appliances in the new construction market. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.
- **MyWay Prepaid Program**
The MyWay Prepaid Program offers an option for all customers, especially those who prefer to prepay for services versus being billed monthly. It is consumer-focused experience for environmentally conscious consumers who like to keep their consumption in mind. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.
- **Residential Distributed Generation and Battery Rebate Program**
The Residential Distributed Generation and Battery Rebate Program pays a financial incentive to encourage the use of battery storage when purchasing new solar voltaic systems. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.

Commercial Programs

- **Commercial Energy Audit**
In the Commercial Energy Audit Program, JEA examines businesses, educates customers, and makes recommendations on low-cost or no-cost energy-saving practices.
- **Commercial Prescriptive Lighting Program**
Commercial Prescriptive Lighting Program pays a financial incentive to customers to encourage the use of high efficiency lighting technology.
- **Commercial Prescriptive**
The Commercial Prescriptive Program provides incentives to encourage the use of high efficiency HVAC, lighting, cooking, and water heating products. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.
- **Small Business Direct Install**
The Small Business Direct Install Program promotes the use of high efficiency HVAC, lighting, water heating, and appliances in the small business sector. This program has not

been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.

- **Custom Commercial**

The Custom Commercial Program promotes the use of custom efficiency measures based on specific applications for each customer. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.

- **Commercial Distributed Generation and Battery Rebate Program**

The Commercial Distributed Generation and Battery Rebate Program pays a financial incentive to encourage the use of battery storage when purchasing new solar voltaic systems. This program has not been approved by the Commission and is not part of JEA's FEECA goalsetting process. Nevertheless, JEA maintains that this program creates demand and energy savings.

B. Orlando Utilities Commission

Residential Programs

- **Residential Home Energy Survey**

The home energy walk-through surveys were designed to provide residential customers with recommended energy efficiency measures and practices customers can implement, and to encourage participation in various OUC rebate programs. OUC provides participating customers specific tips on conservation and details on customer rebate programs.

- **Residential Duct Repair Rebate**

The program is designed to encourage residential customers to repair leaking ducts on existing systems. Qualifying customers must have an existing central air conditioning system, within certain limits and ducts must be sealed with mastic and fabric tape or any other Underwriters Laboratory (UL) approved duct tape.

- **Residential Ceiling Insulation Upgrade Rebate**

The Residential Ceiling Insulation Upgrade Rebate Program is offered to residential customers to encourage the upgrade of attic insulation.

- **Residential High-Performance Windows Rebate**

The Residential High Performance Windows Rebate Program encourages customers to improve energy efficiency in their homes by purchasing ENERGY STAR® rated energy efficient windows.

- **Residential Efficient Electric Heat Pump Rebate**

The Residential Efficient Electric Heat Pump Rebate Program provides rebates to customers in existing homes who install heat pumps having a seasonal energy efficiency ratio (SEER) of 15.0 or higher.

- **Residential New Home Rebate**
The Residential New Home Rebate Program offers rebates for cool/reflective roofs, block wall insulation, ceiling insulation upgrades to R-38, heat pumps, ENERGY STAR washing machines, ENERGY STAR heat pump water heaters, and solar water heaters.
- **Heat Pump Water Heater Rebate**
The program provides rebates for the heat pumps commonly known as hybrid electric heat pump water heaters for qualifying installations
- **Residential Efficiency Delivered (Low-Income)**
The Residential Efficiency Delivered Program is income based and provides up to \$2,500 of energy and water efficiency upgrades based on the needs of the residential customer's home. An OUC Conservation Specialist visits the home, performs a home survey, and recommends which home improvements have the most potential of lowering utility bills.

Commercial Programs

- **Commercial Energy Audit**
The Commercial Energy Audit Program includes a free survey consisting of a physical walk-through inspection of the commercial facility performed by experienced energy experts. The customer receives a written report detailing cost-effective recommendations to make the facility more energy and water efficient.
- **Commercial Efficient Electric Heat Pump Rebate**
The Commercial Efficient Electric Heat Pump Rebate Program provides rebates to qualifying customers in existing buildings who install heat pumps having a seasonal energy efficiency ratio (SEER) of 15.0 or higher.
- **Commercial Duct Repair Rebate**
The Commercial Duct Repair Rebate Program commercial customers to repair leaking ducts on existing systems. Qualifying customers must have an existing central air conditioning system of within certain limits and ducts must be sealed with mastic and fabric tape or any other UL approved duct tape.
- **Commercial High-Performance Windows Rebate**
The Commercial High Performance Windows Rebate Program encourages customers to install windows that minimize heating, cooling, and lighting costs.
- **Commercial Ceiling Insulation Rebate**
The Commercial Ceiling Insulation Rebate Program aims to increase building resistance to heat loss and gain. Customers receive a rebate for upgrading their attic insulation up to R-30.

- **Commercial Cool/Reflective Roof Rebate**
The Commercial Cool/Reflective Roof Rebate Program aims to lower roof surface temperature while increasing the lifespan of the roof. OUC provides rebates for ENERGY STAR cool/reflective roofing that has an initial solar reflectance greater than or equal to 0.70.
- **Indoor Lighting Billed Solution Program**
The Indoor Lighting Billed Solution Program assists commercial customers with investments in new lighting technologies. The program is a cash-flow neutral billed solution where the savings pay for the project's cost over the pay-back period or term.
- **Indoor Lighting Rebates Program**
The Indoor Lighting Rebates Program offers commercial customers that upgrade the efficiency of their indoor lighting a rebate if they meet certain requirements. Participation is open to facilities located within OUC's service area that receive electric service under an OUC commercial rate.
- **Custom Incentive Program**
Through the Custom Incentive Program, commercial customers receive incentives based on the reduction in peak demand their projects achieve plus the first-year energy savings.

Natural Gas FEECA Utility

A. Peoples Gas System

Residential Programs

- **Residential Customer Assisted Energy Audit**
The Residential Customer Assisted Audit is designed to save energy by increasing residential customer awareness of natural gas use in personal residences. Recommendations provided to the customer include an estimated range of energy savings including insightful advice on how to manage their overall energy usage. This audit is only available in an online format.
- **Residential New Construction**
The Residential New Construction Program is designed to save energy for new homeowners by offering incentives to builders and developers who construct new single family and multi-family homes with the installation of energy efficient natural gas appliances.
- **Residential Appliance Retention**
The Residential Appliance Retention Program is designed to encourage current natural gas customers to make cost-effective improvements in existing residences by replacing existing natural gas appliances with energy efficient natural gas appliances.

- **Residential Appliance Replacement**
The Residential Appliance Replacement Program is designed to encourage customers to make cost-effective improvements in existing residences by replacing existing electric appliances with energy efficient natural gas appliances.
- **Oil Heat Replacement**
The Oil Heat Replacement Program is designed to encourage customers to make cost-effective improvements in existing residences by converting/replacing their existing oil heating system to more energy efficient natural gas heating.

Commercial/Industrial Programs

- **Commercial Walk-Through Energy Audit**
This program is designed to reduce demand and energy consumption of C/I facilities by increasing customer awareness of the energy use in their facilities.
- **Commercial Electric Replacement**
The Commercial Electric Replacement Program is designed to encourage commercial customers to make cost-effective improvements in existing facilities by replacing electric resistance appliances with energy efficient natural gas appliances.
- **Gas Space Conditioning**
The Gas Space Conditioning Program is designed to encourage commercial customers to make cost-effective improvements in existing facilities by converting/replacing their electric space conditioning equipment to energy efficient natural gas space conditioning equipment.
- **Small Package Cogeneration**
The Small Package Cogeneration Program is designed to encourage commercial customers to make cost-effective improvements in existing facilities by the installation of an energy efficient on-site natural gas-fired combined heat and power system for the simultaneous production of mechanical and thermal energy.
- **Commercial New Construction**
The Commercial New Construction Program is designed to save energy for new commercial facility owners by offering incentives to commercial customers for the installation of natural gas appliances.
- **Commercial Retention**
The Commercial Retention Program is designed to encourage current natural gas commercial customers to make cost-effective improvements in existing residences by replacing existing natural gas appliances with energy efficient natural gas appliances.
- **Commercial Replacement**
The Commercial Replacement Program is designed to encourage commercial customers to make cost-effective improvements in existing facilities by replacing electric appliances with energy efficient natural gas appliances.

Other Programs

- **Monitoring and Research**

The Monitoring and Research Program is designed to pursue research, development, and demonstration projects designed to promote energy efficiency and conservation.

- **Conservation Demonstration and Development**

The Conservation Demonstration and Development Program is designed to encourage Peoples Gas System and other natural gas LDCs to pursue opportunities for individual and joint research, including testing of technologies to develop new energy conservation programs.