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April 2, 2024

## BY E-PORTAL

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

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

Dear Mr. Teitzman:

Attached for filing, please find the Associated Gas Distributors of Florida's Responses to Staff's Third Data Requests.

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

Sincerely,

Beth Keating

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**MEK** 

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

## Responses of Associated Gas Distributors of Florida (AGDF) to Staff's Third Set of Data Requests

- 1. Re: Docket No. 20230121-EG Petition of Associated Gas Distributors of Florida (AGDF) for Approval of Conservation Demonstration and Development Program AGDF's response to Staff's First Data Request, No. 1.B., states, in part, that PGS "can participate in joint research projects with the AGDF members or pursue independent research projects."
  - A. To what extent does PGS intend to participate in any specified project (e.g. planning, funding, design, implementation, etc.) if AGDF and PGS agree that PGS will, in fact, participate?

AGDF RESPONSE: PGS may "participate" in any specified joint research project in the same ways other AGDF member LDCs may participate. Specifically, AGDF LDCs may participate by designing, proposing, selecting, implementing and/or funding/co-funding gas-related energy conservation demonstration and development efforts that are compatible with the program categories depicted in the CDD Research Criteria & Categories section. While AGDF can identify the means of participation by its LDC members, it is without knowledge as to PGS' specific intentions.

B. Please state the financial support PGS plans to provide, if any, to any joint research project(s) with AGDF, if the petition is approved, for 1. the remaining months of 2024 and for 2. the period inclusive of the years 2025 through 2029 (please specify timing and the name of the project(s)).

<u>AGDF RESPONSE</u>: AGDF is without knowledge as to PGS' plans to provide financial support to any joint research project if AGDF's petition is approved.

- 2. Provide details of research projects, if any, that PGS plans at this time to pursue that would be coordinated in conjunction with any Commission-approved AGDF CDD program:
  - A. for the remaining months of 2024;

<u>AGDF RESPONSE</u>: AGDF is unaware of any current plans by PGS to pursue research projects that would be coordinated in conjunction with any Commission-approved AGDF CDD program.

B. for the period inclusive of the years 2025 through 2029.

AGDF RESPONSE: Please see AGDF's response to Data Request 2A.

3. If PGS does participate in a specified AGDF CDD project, will it do so with the understanding that the results of such a project will be shared with all member(s) of AGDF, including those that may have chosen to not financially support (i.e. opt out of) the project? Please explain.

AGDF RESPONSE: If PGS chooses to engage in a particular AGDF CDD project, it will do so with the understanding that the outcomes will be shared with all AGDF member utilities including those that have opted not to provide financial backing. This full disclosure practice has been a longstanding tradition within AGDF and reflects the resource disparities between larger and smaller utilities.

4. Does PGS plan to reflect its potential participation in CDD projects associated with AGDF's proposed CDD program in PGS's upcoming April 2024 FEECA goals petition (i.e. Commission's review of 2025-2029 FEECA numerical goals, programs, and standards in Docket No. 20240018-EG)? Please explain.

<u>AGDF RESPONSE</u>: AGDF is without knowledge as to PGS' plans regarding any potential filings in Docket No. 20240018-EG.