

July 1, 2024

BY ELECTRONIC FILING

Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: In re: Commission review of numeric conservation goals (JEA),
Docket No. 20240016-EG

Dear Mr. Teitzman:

On behalf of JEA, I have enclosed the rebuttal testimony and exhibits of Brian Pippin. Please file these documents in Docket No. 20240016-EG.

Please acknowledge receipt and filing of the above. If you have any questions concerning this filing, please contact me at (850) 270-5938 or by email at gperko@holtzmanvogel.com. Alternatively, my paralegal, Zack Bennington, can be reached at (762) 585-0490 or by email at zbennington@holtzmanvogel.com.

Thank you for your assistance in this matter.

Sincerely,

/s/ Gary V. Perko
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Enclosure: Rebuttal Testimony of Brian Pippin

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **REBUTTAL TESTIMONY OF BRIAN PIPPIN**

3 **ON BEHALF OF**

4 **JEA**

5 **DOCKET NO. 20240016-EG**

6 **JULY 1, 2024**

7

8 **Q. Please state your name and business address.**

9 A. My name is Brian Pippin. My business address is 225 N. Pearl St., Jacksonville,
10 Florida, 32202.

11

12 **Q. Have you previously submitted direct testimony in this proceeding?**

13 A. Yes.

14

15 **Q. What is the purpose of your rebuttal testimony?**

16 A. The purpose of my testimony is to rebut the assertion of Florida Rising witness,
17 MacKenzie D. Marcelin, that the Commission should order JEA to expand its
18 Neighborhood Energy Efficiency (NEE) Program by 5-fold.

19

20 **Q. Are you sponsoring any exhibits to your rebuttal testimony?**

21 A. Yes. Exhibit No. __ [BP-9] summarizes the peak demand and energy reductions
22 achieved through the NEE Program since 2010.

23

24

25

1 **Q. Please describe JEA’s Neighborhood Energy Efficiency Program.**

2 A. The NEE Program is available to assist income-qualified customers in making
3 energy and water efficiency upgrades in their homes. These customers live on low
4 or fixed incomes in disadvantaged neighborhoods as designated by the U.S. Census
5 Bureau as having 50 percent or more of the residents living at or below 150 percent
6 of the Federal Poverty guidelines.

7

8 The NEE Program provides the installation of up to 15 electric and water
9 conservation measures as well as an energy education package of printed material
10 including savings tips and energy consultation/education. We also discuss
11 additional JEA resources and other community conservation programs, such as the
12 Community Action Agency's (CAA) Weatherization Assistance Program (WAP),
13 providing referrals where appropriate. Importantly, there is no cost to customers
14 who participate in the NEE Program, as JEA covers all equipment, installation, and
15 administrative costs under the program.

16

17 In addition, JEA looks within these homes for those in need of attic insulation. JEA
18 offers an additional service whereby we provide blown-in attic insulation to bring
19 the home's insulation value up to an R38-value in accordance with U.S. Department
20 of Energy WAP standards at no cost to the customer.

21

22 **Q. Has JEA calculated the energy savings associated with the NEE Program?**

23

24

25

1 A. Yes. Since 2010, the NEE Program has resulted in peak demand reductions of
2 approximately 8,000 kW (summer) and approximately 7,000 kW (winter), with
3 energy reductions of more than 17,000,000 kWh.
4

5 **Q. How did JEA calculate the peak demand and energy reductions resulting from**
6 **the NEE Program?**

7 A. The peak demand and energy reductions were calculated based on the summer kW,
8 winter kW, and overall kWh reductions at the meter for the NEE Program since
9 2010 as detailed in JEA's annual reports on Demand-Side Management Plans. This
10 information is summarized in the attached Exhibit No. __ [BP-9].
11

12 **Q. Is Mr. Marcelin's proposal that the Commission order JEA to expand its NEE**
13 **Program by 5-fold appropriate?**

14 A. No. Mr. Marcelin's proposed 5-fold increase is an arbitrary figure that is not
15 supported by any analysis of achievability or cost-effectiveness as required by
16 Commission rules. However, we do know from the analyses performed by Resource
17 Innovations that residential conservation measures of the type included in JEA's
18 NEE Program do not pass the Rate Impact Measure (RIM) test, and the NEE
19 Program as a whole does not pass the RIM test, meaning that the NEE Program puts
20 upward pressure (i.e., increases) JEA's rates to its customer.
21

22 In prior proceedings, the Commission has recognized that it is appropriate to set
23 goals for municipal utilities based on RIM, but to defer to the municipal utilities'
24 governing bodies to determine the level of investment in any measures that do not

1 pass RIM. As the Commission recently stated in Order No. PSC-2020-0200-PAA-
2 EG, p.5 (June 24, 2020):

3 For municipal utilities such as JEA, local decisions fall within the
4 jurisdiction of JEA's governing body regarding the investment in
5 energy efficiency that best suits local needs and values.
6 Accordingly, as we have recognized in prior proceedings, it is
7 appropriate to defer to municipal utilities' governing bodies to
8 determine the level of investment if measures are not cost-effective.

9 The NEE Program is an example of JEA exercising its judgment. to offer
10 conservation measures that do not pass RIM but are in the best interests of JEA's
11 customers.

12
13 Furthermore, based on a simple extrapolation, the suggested 5-fold increase in its
14 NEE Program would cost approximately \$22.7 million over the 10-year goal-setting
15 period simply to administer the program. This would represent an approximate 50%
16 increase in the total projected budget for JEA's proposed goals in this docket. It
17 should be noted that this cost estimate does not represent the costs of recruitment
18 and acquisition of additional customers. Any increase in proposed program size
19 typically requires additional resources and costs beyond the current cost per
20 customer.

21
22 **Q. Does JEA promote energy savings among low-income customers in any ways
23 other than through the NEE Program?**

24 A. Yes. Outside of the NEE Program, JEA works with the federal Low Income Home
25 Energy Assistance Program (LIHEAP) program to provide bill assistance, and

1 during the Senior Day interviews, flyers and resources are provided for JEA
2 programs and other community resources to help low-income seniors save on their
3 utility bills. JEA provides speakers from its Ambassador Team to give a "Savings
4 Without Sacrifice" presentation to neighborhood associations, churches, schools,
5 community development groups, and other organizations in low-income
6 neighborhoods. The presentation provides conservation information in addition to
7 product demonstrations on how to install low-cost energy-saving products.

8

9 JEA also participates in regular events with the leaders of multiple advocacy groups
10 for low-income, seniors, and disabled persons to promote a strong network of
11 communication, keeping these leaders aware of utility programs, changes,
12 resources, etc., available to their clients.

13

14 **Q. Does that conclude your rebuttal testimony?**

15 A. Yes, it does.

Summary of JEA's Neighborhood Energy Efficiency Program kW and kWh Reductions

Year	Participants	Summer kW	Winter kW	kWh Reduction
2010	1,564	561	561	1,277,788
2011	1,539	553	553	1,257,363
2012	1,534	551	551	1,253,278
2013	1,459	524	524	1,192,003
2014	1,468	527	527	1,199,356
2015	1,005	355	355	862,290
2016	1,518	536	536	1,302,444
2017	1,225	432	432	1,051,050
2018	1,294	457	457	1,110,252
2019	1,253	442	442	1,075,074
2020	1,122	617	415	1,171,368
2021	1,687	928	624	1,761,228
2022	1,413	777	523	1,475,172
2023	1,308	719	484	1,365,552
Total:	19,389	7,979	6,984	17,354,218