



Stephanie A. Cuello  
SENIOR COUNSEL

August 7, 2024

**VIA ELECTRONIC FILING**

Mr. Adam J. Teitzman, Commission Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket 20240013-EG, Commission review of numeric Conservation goals by Duke Energy Florida, LLC.

Dear Mr. Teitzman,

Enclosed for filing on behalf of Duke Energy Florida, LLC (“DEF”) is DEF’s Amended Joint Notice of Necessary Stipulations. This Amended Joint Notice of Necessary Stipulations is being filed to capture the following changes:

- Provide clarifying language to the scope of the stipulations;
- Update the stipulation language for Issue 8a and 8b; and
- Reflect FIPUG’s position in regards to Issue 8a

The language in Issue 12 remains unchanged.

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1425 should you have any questions concerning this filing.

Respectfully,

*/s/ Stephanie A. Cuello*

Stephanie A. Cuello

SAC/clg  
Attachments

**CERTIFICATE OF SERVICE**

*Docket No. 20240013-EG*

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 7th day of August 2024.

/s/ Stephanie A. Cuello

Attorney

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Commission review of numeric conservation goals (Duke Energy Florida, LLC)

Docket No. 20240013-EG

Dated: August 7<sup>th</sup>, 2024

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**Amended Joint Notice of Necessary Stipulations**

Duke Energy Florida, LLC, (“DEF”), the Florida Industrial Power Users Group (“FIPUG”), Nucor Steel Florida, Inc. (“Nucor”), White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (“PCS Phosphate”), Walmart Inc., Florida Rising, Inc., and LULAC Florida Inc. (the “Stipulating Parties”), hereby provide Notice that they have reached Necessary Stipulations (as discussed in Paragraph 33 of the 2024 Settlement Agreement filed contemporaneously in Docket No. 20240025-EI) on two (2) issues, specifically Issue 8(a) & 8(b)<sup>1</sup> and Issue 12, as provided below.

**STIPULATIONS**

**Issue 8(a): Should demand credit rates for interruptible service, curtailable service, stand-by generation, or similar potential demand response programs be addressed in this proceeding or in the base rate proceedings for the rate regulated FEECA Utilities?**

Stipulation

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<sup>1</sup> Issue 8 currently asks: “Should demand credit rates for interruptible service, curtailable service, stand-by generation, or similar potential demand response programs be addressed in this proceeding or in the base rate proceedings for the rate regulated FEECA Utilities? If this proceeding, what demand credit rates are appropriate for purposes of establishing the utilities’ goals?”

The Stipulation provided herein relates to the second of the two questions (credit levels) but does not address the first except as provided in the 2024 Settlement Agreement. Therefore, the Stipulating Parties propose to bifurcate the issue into two parts, (a) and (b).

With respect to DEF, based on the stipulation to Issue 8b described below, the parties agree that no general policy guidance is required on this question at this time. The parties further agree that no changes in these credits shall be implemented any earlier than the effective date of new DEF base rates implemented pursuant to a general base rate proceeding, and that such new IS/CS/GSLM-2 credits shall only be implemented prospectively from such effective date. At such time as DEF's base rates are reset in a general base rate proceeding, the IS/CS/GSLM-2 credits may be reset. In the next Demand Side Management goals and plan approval proceeding (currently anticipated to occur in 2029), DEF shall not propose to change the level of the credits.<sup>2</sup>

**Issue 8(b): In this proceeding, what demand credit rates as appropriate for establishing DEF's goals?**

Stipulation:

For the purpose of Stipulation and for the limited purpose of establishing DEF's goals, the parties agree that Issue 8b is not applicable and that the appropriate demand credits are those stated in the pending 2024 Settlement Agreement filed contemporaneously in Docket No. 20240025-EI.

**Issue 12: What residential and commercial/industrial summer and winter megawatt (MW) and annual Gigawatt-hour (GWh) goals should be established for the period 2025-2034?**

Stipulation:

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<sup>2</sup> FIPUG does not join in the proposed stipulation on Issue 8a and reserves the right to state their position on the record at the hearing.

DEF’s energy efficiency goals will reflect their proposed goals, plus an increase in participation for Neighborhood Energy Saver by 10% and an increase the installation of smart thermostats from 10% to 40%. This results in the following goals for the 10-year period:

2025-2034 Annual Goals									
Recommended Annual Goals (values at the generator)									
	Residential			Non-Residential			Total		
	WMW	SMW	GWH'S	WMW	SMW	GWH'S	WMW	SMW	GWH'S
2025	32	21	50	4	7	5	35	28	55
2026	32	21	51	3	7	5	35	28	56
2027	33	22	52	4	9	6	38	31	58
2028	34	22	53	4	9	6	38	31	59
2029	34	22	54	4	10	7	39	32	61
2030	33	22	53	4	9	6	37	31	59
2031	33	22	53	4	8	6	37	30	59
2032	33	22	54	5	8	5	38	30	59
2033	33	22	54	5	8	4	38	30	58
2034	33	22	54	5	8	4	38	29	58
<b>TOTAL</b>	<b>331</b>	<b>215</b>	<b>527</b>	<b>42</b>	<b>84</b>	<b>55</b>	<b>373</b>	<b>300</b>	<b>582</b>

FIPUG agrees to the stipulations only with respect to Issue 8b and Issue 12, and reserves the right to state their position on Issue 8a on the record at the hearing.

Respectfully submitted this 7th day of August, 2024.

*/s/ Stephanie A. Cuello*  
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Florida Industrial Power Users Group

By \_\_\_\_\_

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7/15/24

Stipulation in  
2024 GOALS  
Docket per  
RATE CASE  
Settlement w/  
Duke Energy Florida, LLC




Nucor Steel Florida, Inc.

By  \_\_\_\_\_

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**PCS White Springs**

By   
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