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DIVISION OF ENGINEERING
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Public Service Commission

November 21, 2024

Mr. J. Jeffrey Wahlen
Ausley McMullen Law Firm
123 South Calhoun St.
Tallahassee, Florida 32301
jwahlen@ausley.com

**STAFF'S FIRST DATA REQUEST
VIA EMAIL**

Re: Docket 20240148-EG - Petition for approval of proposed demand-side management plan, by Peoples Gas System, Inc.

Dear Mr. Wahlen:

By this letter, Commission staff requests that Peoples Gas System (PGS or Utility) provide responses to the following data request. Please refer to PGS's Demand-Side Management (DSM) Plan, attached to the Utility's Petition as Exhibit A for the following questions.

1. Refer to the Residential New Construction program discussed on pages 4, 13, and 59 of the Company's DSM Plan. Please verify that the natural gas dryer stub rebate does not require the installation of an appliance. If not, explain how the installation of a natural gas dryer stub is a conservation method, including any prior Commission Orders, if applicable, allowing similar rebates. As part of your response, identify the amount of therm savings attributed to this appliance in the analysis.
2. Refer to the Commercial Retention Program discussed on pages 5-6, 50, and 67 of the Company's DSM Plan. Explain the Company's justification for the restructured rebate amounts for the fryers. This should include any additional savings, net benefits, or other considerations that influenced the Company.
3. Refer to the Conservation Research and Development (R&D) program discussed on page 55 of the Company's DSM Plan.
 - a. Detail the historic project(s) that were undertaken by the Conservation R&D program approved by Order No. PSC-2021-0242-PAA-EG, during the period 2021 through 2024. This detail should include each project's costs and objective.
 - b. Detail the Company's planned project(s) associated with this program. This detail should include each project's costs and objective. If there are planned projects with similarities to historic projects, explain the differences between the two projects. If no projects are planned, explain why not.

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4. Refer to page 10 of the Company's DSM Plan and Commission Order No. PSC-2024-0280-PAA-EG. Detail the differences in 2025-2034 DSM Plan numeric conservation goals and the Commission-Approved 2025-2034 numeric conservation goals. As a part of this response, provide the savings associated with each program for both the DSM Plan and Commission-approved numeric conservation goals and explain the cause of any differences.
5. Refer to pages 3 - 6 of the Company's DSM Plan. For each program in the Company's DSM Plan, provide the following information.
 - a. Detail any changes to the program description of the proposed DSM program from the program proposed by the Company in Docket 20240018-EG. If there are any changes, provide an explanation for each change for each applicable program.
 - b. Detail any changes to the program costs for rebates and administrative expenses of the proposed DSM program from the program assumptions used by the company in Docket 20240018-EG. If there are any changes, provide an explanation for each change for each applicable program.
 - c. Detail any changes to the therm savings of the proposed DSM program from the program assumptions used by the Company in Docket 20240018-EG. If there are any changes, provide an explanation for each change for each applicable program.
 - d. Detail any changes to the participation rates of the proposed DSM program from the program assumptions used by the Company in Docket 20240018-EG. If there are any changes, provide an explanation for each change for each applicable program.
6. Please provide a comparison between the cost-effectiveness inputs used in the Company's DSM Plan and those used by the Company in Docket 20240018-EG. If there are any changes, provide an explanation for each change.
 - a. Provide a comparison between the cost-effectiveness results for the G-RIM and PCT of each proposed DSM program and the program used by the Company in Docket 20240018-EG.
7. Refer to the Company's DSM Plan's attached program standards on pages 56-69. For each program, provide a type and strike version of the DSM Plan that details any changes to the participation program standards (participation eligibility, rebate amounts, rebate eligibility and application requirements) of the proposed DSM program from the programs approved by Commission Order No. PSC-2019-0361-PAA-GU. If there are any changes, explain the changes for each applicable program.

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Please file all responses electronically no later than **Tuesday, December 10, 2024**, via the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20240148-EG) and also please email the filed response to discovery-gcl@psc.state.fl.us. If you have any questions, please contact me by phone at (850) 413-6686, or by email at owooten@psc.state.fl.us.

Sincerely,

s/ Orlando Wooten

Orlando Wooten
Engineering Specialist
Division of Engineering

OW:da

cc: Office of Commission Clerk (Docket No. 20240148-EG)
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