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Dianne M. Triplett Associate General Counsel – Florida

July 14, 2011

VIA Overnight Mail

Ms. Ann Cole Commission Clerk Office of Commission Clerk 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket No.: 110000-OT – Undocketed Filings – 2012 FEECA Report Data Collection

Dear Ms. Cole:

Please find enclosed for filing on behalf of Progress Energy Florida, Inc., the original and five (5) copies of its responses to Staff's Second Data Request issued July 1, 2011.

Please let me know if you have any questions. Thank you for your assistance in this matter.

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Progress Energy Florida, Inc. P.O. Box 14042 St. Petersburg, FL 33733

Sincerely, 1. hypetto

Dianne M. Triplett

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# PROGRESS ENERGY FLORIDA'S RESPONSE TO STAFF'S SECOND DATA REQUEST (NOS. 1-3) DOCKET NO. 110000-OT 2012 FEECA REPORT DATA COLLECTION DUE: JULY 15, 2011

### Question 1.

This question refers to the table "Comparison of Achieved MW & GWH Reductions With PSC Established Goals" completed as part of your response to Question No. 3 of Staff's First Data Request. Please clarify and discuss the table notation "C/I goals were based on measures that were cost-effective." Were the measures determined to be cost-effective based on the RIM test, E-TRC test or some other cost-effectiveness test?

#### Response:

The table notation "C/I goals were based on measures that were cost-effective.", was simply to note that PEF's C/I goals were from the original March 31, 2010 approved set of cost-effective goals. They were cost-effective balancing all three of the cost-effective tests: E-TRC, E-Participant and E-RIM.

#### Question 2.

This question refers to the table PEF provided in answer to Question No. 4 of Staff's First Data Request. Please explain how the "Approximate avoided ECCR costs (\$27,300,000)" were calculated.

#### Response:

To arrive at a high level estimate of how our DSM Goal achievement for 2010 impacted our customers, the 2010 ECCR approved cost of \$3.24 per 1,200 kWh was subtracted from the estimated \$4.84 RMP cost per 1,200 kWh and resulted in a difference of \$1.60 or \$0.001333 per/kWh.

PEF's 2010 retail sales of 20,524,059,888 kWh was multiplied times the ECCR difference of \$0.001333 per/kWh to yield the estimate of \$27,364,729 ECCR cost difference between PEF's 2010 approved ECCR charge and the RMP ECCR estimate for the first year of the plan.

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## Question 3.

This question refers to PEF's answer to Question No. 5 of Staff's First Data Request. Please expand on answer e. regarding how the difference between the goals and actual achievements have impacted the general body of ratepayers with regard to greenhouse gas emissions. Why have greenhouse gas emissions resulting from total DSM Achievements caused an additional 168.6 GWhr of generation? Does the emissions rate of approximately 98 ktons represent an increase over the emissions rate of the previous year?

#### Response:

The goals assumed a certain amount of generation (and resulting greenhouse gas emissions) would have been avoided had the goals been met. However, actual achievements were less than the goals. The 168.6 GWhr of generation represent the amount of generation that was not avoided as a result of not meeting goals and was the calculated difference between the 2010 DSM Goals and the actual achieved amount as shown in the table in the response to Question no. 4 to Staff's First Data Request. The GWhr delta for the Residential sector was -202.6 and for Commercial & Industrial it was 34.0 GWhr; thus a summed total difference between the 2010 DSM Goals versus PEF's 2010 DSM Achievement of 168.6 GWhr.

Question 5e stated "Please also estimate how the difference between the goals and actual achievements has impacted the general body of PEF ratepayers with regard to greenhouse gas emissions."

Given the calculation above, the difference between the goals and the actual achieved DSM energy reductions has been calculated to be 168.6 GWhr for 2010. PEF used the system average rate of  $CO_2$  emissions to calculate an increased amount of  $CO_2$  emissions. This value should be 111.7 ktons (note that this value is different from the 98 ktons in the earlier response due to a calculation error in the earlier response). As shown in the response to Question 35 of our previously filed responses to Supplemental Data Requests, the 2010 fleet average  $CO_2$  emissions rate was 1325 lb/MWhr. This represents a slight increase over 2009 for reasons that are unrelated to DSM achievements.