



Matthew R. Bernier
 Senior Counsel

December 21, 2015

Ms. Carlotta Stauffer, Commission Clerk
 Florida Public Service Commission
 2540 Shumard Oak Boulevard
 Tallahassee, FL 32399-0850

Re: Revisions to Program Standards - Ten-Year DSM Plan 2015 – 2024

Dear Ms. Stauffer:

Duke Energy Florida, LLC (DEF) respectfully requests administrative approval of two revisions to the Demand Side Management Program Standards that were approved by the commission staff on October 29, 2015.

DEF submitted Program Standards for administrative approval in Docket 150083-EI on October 15, 2015. On October 29, 2015, staff sent a letter finding that the Program Standards were consistent with the approved DSM Plan and requesting that DEF notify the Commission prior to any changes being made to the program standards as filed.

DEF recently discovered two items in the Better Business Program Standards that need to be revised as the language is not consistent with how DEF intends to implement and operate the program. The revisions to the Program Standards are outlined in the table below and the revised pages are attached in both clean and red-line/strike-out format. The standards as revised remain consistent with the DSM Plan that was approved by the Commission in Order 15-0332-PAA-EG.

| Program | Page | Measure | Description of Change |
|-------------------------|-------------|----------------------|---|
| Better Business Program | Page 74 | HVAC/Chiller Tune-up | The Program Standards currently specify that the incentive amount for tune-ups on units up to 300 tons will be \$25 per ton and the incentive for units larger than 300 tons will be \$5 per ton. The incentive amount for HVAC units should be set at \$25 per ton regardless of the size of the unit and the incentive for Chillers should be set at \$5 per ton regardless of the size |

| | | | |
|-------------------------|---------------|--|---|
| | | | of the unit. The average incentive paid for tune-ups is still expected to be \$10 per ton which is consistent with the language in DSM Plan approved in Order PSC-15-0323-PAA-EG. |
| Better Business Program | Pages 87 & 88 | Table 12.5 - Technical Specifications on Equipment Eligibility - Variable Refrigerant Flow Multi-Split Air Conditioners and Heat Pumps | The reference to “All Other Types of Heating” in the “Heating Type” column should be removed as this could be interpreted to include units with gas heating which would not be eligible for incentives. |

Sincerely,

/s/ Matthew R. Bernier

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Senior Counsel

MRB/db

Attachment

| | |
|--------------------------------|--|
| Duct Repair | 25% of the repair cost up to a maximum of \$50 per unit for facilities with non-ducted electric heat |
| | 50% of the repair cost up to a maximum of \$150 per unit for facilities with ducted electric heat. Commercial multi-family units count on a per unit basis, receive \$100 and no duct test is required - applies to top floors only on multi-story buildings. |
| Energy Recovery Ventilation | \$1.40 per CFM, minimum 450 CFM unit >65% total heating effectiveness per AHRI 1060-2000 |
| HVAC Coil Cleaning | \$20 per unit (PTHP/PTAC) -- one-time incentive \$20 per ton for all other type of air conditioning units – one time incentive not to exceed 50% of the total project or service cost. |
| Roof Top Unit Re-commissioning | \$25 per ton – one time incentive not to exceed 50% of the total project or service cost. |
| HVAC/Chiller Tune-up | \$25 per ton for HVAC units \$5 per ton for Chiller units The expected average incentive paid out will be \$10 per ton based on expected participation. |

4.1 INCENTIVE PROCESSING

1. On-site inspections will be performed on at least 10% of the completed projects for each program measure.
2. Project supporting documents will be collected and reviewed for program compliance.
3. Incentives will not be paid until the review (and inspection when required) is completed.
4. A copy of the customer's invoice, purchase order, or equivalent (determined by DEF) must accompany the incentive application for all measures, and must be received within six (6) months of the completion of that measure. For a new construction measure the supporting documentation must be received within six (6) months of the Certificate of Occupancy, or permanent meter set.

12.4 TECHNICAL SPECIFICATIONS ON EQUIPMENT ELIGIBILITY

| Unitary AC and Heat Pumps (> 65,000 Btu/h) | | | |
|--|--|---------------------|--|
| Equipment Type and Size Range | 2010 State Energy Code Standard | | Minimum Efficiency Eligible for Incentive |
| Air-Cooled | Air Conditioner | Heat Pump | |
| 65,000-135,000 Btu/h | 11.2 EER | 11.0 EER 3.3 COP | 11.9 EER 3.48 COP |
| 135,001 Btu/h – 240,000 | 11.0 EER | 10.6 EER 3.2 COP | 11.69 EER 3.42 COP |
| 240,001 – 760,000 Btu/h | 10.0 EER | 9.5 EER 3.2 COP | 10.63 EER 3.27 COP |
| Over 760,000 Btu/h | 9.7 EER | 9.5 EER 3.2 COP | 10.31 EER 3.13 COP |
| Water-Cooled | Air Conditioner | Heat Pump | |
| 65,000-135,000 Btu/h | 11.5 EER | 12 EER 4.2 COP | 12.5 EER 4.56 COP |
| over 135,000 Btu/h | 11.0 EER | N/A | 12.0 EER 4.38OP |

12.5 TECHNICAL SPECIFICATIONS ON EQUIPMENT ELIGIBILITY

| Variable Refrigerant Flow Multi-Split Air Conditioners and Heat Pumps | | | |
|--|---------------------------------|---|-------------------------|
| Equipment Type | Cooling Capacity (Btu/h) | Heating Type | Efficiency Level |
| VFR Multi-Split AC's (Air Cooled) | <65,000 | All | 14.3 SEER |
| | >65,000 <135,000 | No Heating – or has Electric resistance heating | 12.3 EER |

| | | | |
|---|------------------|---|-----------------------|
| | >135,000<240,000 | No Heating – or has Electric resistance heating | 12.1 EER |
| | >240,000<760,000 | No Heating – or has Electric resistance heating | 11.0 EER |
| VFR Multi-Split Heat Pumps (Air Cooled) | <65,000 | All | 14.3 SEER 8.4 HSPF |
| | >65,000 <135,000 | No Heating – or has Electric resistance heating | 12 EER 3.6 COP |
| | >135,000<240,000 | No Heating – or has Electric resistance heating | 11.6 EER 3.6 COP |
| | >240,000<760,000 | No Heating – or has Electric resistance heating | 10.4 EER 3.5 COP |

HVAC SYSTEM RELATED IMPROVEMENTS

11. DEMAND CONTROL VENTILATION (DCV)

13.1 PARTICIPATION REQUIREMENTS

1. Must meet the Eligibility Requirements as outlined in Section 2.
2. Customer must provide documentation of the DCV system and what HVAC load reduction is projected.

| | |
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| HVAC/Chiller Tune-up | \$25 per ton for <u>HVAC</u> units up to 300 tons \$ 5.00 per ton for <u>Chiller</u> units > 300 tons The expected average incentive paid out will be \$10 per ton based on expected participation. |

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| | | | |
|---|------------------|--|--|
| | >135,000<240,000 | No Heating – or has Electric resistance heating All other types of heating | 12.1 EER 11.8 EER |
| | >240,000<760,000 | No Heating – or has Electric resistance heating All other types of heating | 11.0 EER 10.7 EER |
| VFR Multi-Split Heat Pumps (Air Cooled) | <65,000 | All | 14.3 SEER 8.4 HSPF |
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 21st day of December, 2015, to all parties of record as indicated below.

/s/ Matthew R. Bernier

Attorney

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