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Public Service Commission

February 13, 2020

Mr. Ansley Watson, Jr.
Macfarlane Ferguson & McMullen
PO Box 1531
Tampa, FL 33601-1531
aw@macfar.com

STAFF'S SECOND DATA REQUEST VIA US MAIL & EMAIL

Re: Docket No. 20190210-GU - Approval of Demand Side Management Plan, by Peoples Gas System.

Dear Mr. Watson:

By this letter, Commission staff requests that Peoples Gas System (Utility) provide responses to the following data requests:

1. Please identify the total projected annual bill impact on the general body of customers' monthly bills *by program* for each of the proposed residential and commercial demand-side management (DSM) programs.
2. For each proposed residential and commercial DSM programs, please complete the table below by identifying and describing the customer incentives proposed to be provided, along with the incentives currently being provided in the current Commission approved DSM programs.

(Residential/Commercial)		
Program Name	Current Customer Incentive	Proposed Customer Incentive

3. Please refer to the Utility's response to Staff's First Data Request, No. 4. For each of the proposed residential and commercial DSM programs that still fail the Participants Test (PCT) and/or the Gas Rate Impact Measure (G-RIM) Test following the Utility's proposed solution, is it the Utility's assertion that these programs are incapable of passing these tests? Please explain your response in detail.

4. For each of the proposed residential and commercial DSM programs, please identify the projected annual program savings that will contribute to the Commission-approved DSM goals. Please identify retrofit and replacement program savings individually.
5. Please refer to the Utility's response to Staff's First Data Request, No. 12c. Please provide these costs by cost type.
6. Please refer to the Utility's Petition, page 11, filed November 20, 2019.
 - a. For each program that passes G-RIM with a score of 1.000 or higher, please identify and describe what steps the Utility can take to increase participation in DSM programs, or to elevate PCT scores to 1.000 or higher.
 - b. Is it correct that the G-RIM and PCT cost-effectiveness evaluations have an inverse relationship (i.e., if a G-RIM score goes up, a PCT score goes down)? Please explain your response in detail.
 - c. Please identify whether the Utility considered increasing the incentives for programs with G-RIM scores higher than 1.000 and PCT scores lower than 1.000 to optimize PCT cost effectiveness while also maintaining G-RIM cost effectiveness? If so, please explain why the Utility did not pursue such a strategy for setting incentive levels. If no, please explain why not.
7. Please refer to the Utility's Petition, page 22, as filed on November 20, 2019, to answer this question and its subparts:
 - a. Please explain in detail how the projected administrative cost of \$10 an audit was developed.
 - b. Please identify how many Utility employees (in full time equivalent units) will be needed to administer this program.
 - c. Please provide a detailed description of the Utility's residential on-line audit program. As part of your response, please identify whether the Utility acquired or developed the software program/application, as well as the development schedule, costs, sources, and criteria.
8. Please refer to the Utility's Petition, in which multiple pages reflect amounts for "administrative" costs. Please also refer to Rule 25-17.015, F.A.C, which requires that cost recovery filings show "common costs" and "program costs."
 - a. Please identify and describe the type(s) of cost(s) the Utility is recording as "administrative costs."
 - b. Please identify and describe the type(s) of cost(s) that a cost recovery filing might reflect as a "common cost."
 - c. Please identify and describe the type(s) of cost(s) that a cost recovery filing might reflect as a "program cost."
9. Please refer to the Utility's Petition, page 37, filed on November 20, 2019. Please identify the dollar amount and column in the table on this page where the common costs for the Residential – Energy Star Water Heater program are recorded.

Mr. Ansley Watson, Jr.

Page 3

February 13, 2020

Please file all responses electronically no later than **March 2, 2020**, via the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20190210-GU). If you have any questions, please contact me by phone at (850) 413-6592, or by email at tthomps@psc.state.fl.us.

Sincerely,



Takira Thompson
Engineering Specialist

TTT/jp

cc: Office of Commission Clerk (Docket No. 20190210-GU)
Andrew M. Brown – Macfarlane Ferguson & McMullen
Paula Brown/Kandi M. Floyd – Regulatory Affairs
J.R. Kelly/Mireille Fall-Fry – Office of Public Counsel