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July 2, 2020

**VIA ELECTRONIC FILING**

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

Re: *Duke Energy Florida, LLC's Petition for Approval of Proposed Demand-Side Management Plan*; Docket No. 20200054

Dear Mr. Teitzman:

In response to the request from Commission Staff to file any written comments by July 7, 2020, please accept and consider these comments from Duke Energy Florida ("DEF") regarding the Commission Staff's recommendation on DEF's Petition for approval of its demand-side management ("DSM") plan.

This has been a long process and a lot of work has gone into developing a DSM Plan to meet the Commission approved goals in a cost-effective manner. DEF's proposed DSM Plan is also projected to result in a decrease in customer rates when compared to the current-approved DSM programs.<sup>1</sup> Staff, however, has recommended that the Commission reject DEF's proposed DSM Plan and continue its current existing programs. DEF believes that it is important to bring to the Commission's attention that absent the modifications included in DEF's proposed Plan, the now-existing programs will likely not be cost effective going forward and will likely not achieve the Commission approved goals. Staff's recommendation leaves open the opportunity for the utilities to file future modifications to existing programs or to propose new programs for the Commission's evaluation. This approach, however, would result in a tremendous amount of additional work for all parties, both the utilities and Staff, with the end-result being a piecemeal version of what is currently pending before the Commission.

Additionally, if the Commission accepts Staff's recommendation, DEF requests that the Order include language that both acknowledges that DEF may not be able to meet the Commission approved goals with its now-existing Programs and that the now-existing programs may not be

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<sup>1</sup> DEF recognizes that it provided a data response request that contained a typographical error resulting in reporting an inaccurate rate for 2018 (the original response include an ECCR rate of \$2.28 when it should have read \$3.28); DEF corrected this response on June 26, 2020 and apologizes for any confusion it may have caused.

cost effective in the future, but in recognition that this is the direction the Commission has opted to go, neither of these predicted outcomes will result in penalties or disallowances in future cost recovery proceedings.

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Sincerely,

/s/ Matthew R. Bernier  
Matthew R. Bernier

MRB