

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals (Florida Power & Light Company).	DOCKET NO. 20190015-EG
In re: Commission review of numeric conservation goals (Gulf Power Company).	DOCKET NO. 20190016-EG
In re: Commission review of numeric conservation goals (Florida Public Utilities Company).	DOCKET NO. 20190017-EG
In re: Commission review of numeric conservation goals (Duke Energy Florida, LLC).	DOCKET NO. 20190018-EG
In re: Commission review of numeric conservation goals (Orlando Utilities Commission).	DOCKET NO. 20190019-EG
In re: Commission review of numeric conservation goals (JEA).	DOCKET NO. 20190020-EG
In re: Commission review of numeric conservation goals (Tampa Electric Company).	DOCKET NO. 20190021-EG ORDER NO. PSC-2019-0509-FOF-EG ISSUED: November 26, 2019

The following Commissioners participated in the disposition of this matter:

ART GRAHAM, Chairman
JULIE I. BROWN
DONALD J. POLMANN
GARY F. CLARK
ANDREW GILES FAY

APPEARANCES:

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FINAL ORDER APPROVING NUMERIC CONSERVATION GOALS

BY THE COMMISSION:

Background

Enacted in 1980, Sections 366.80 through 366.83, and 403.519, Florida Statutes (F.S.), are known collectively as the Florida Energy Efficiency and Conservation Act (FEECA). FEECA initially required us to adopt conservation goals to increase the efficiency of energy consumption. In 2008, the Legislature further required us to adopt conservation goals to increase the development of demand-side renewable energy systems. Pursuant to Section 366.82(6), F.S., we must review the conservation goals of each utility subject to FEECA at least every five years.

The seven electric utilities subject to FEECA, collectively known as the FEECA Utilities, are Florida Power & Light Company (FPL), Duke Energy Florida, LLC (DEF), Tampa Electric Company (TECO), Gulf Power Company (Gulf), Florida Public Utilities Company (FPUC), JEA, and Orlando Utilities Commission (OUC). Conservation goals were last established for the FEECA Utilities by Order No. PSC-14-0696-FOF-EU (2014 Goalsetting Order), issued December 16, 2014.¹ Therefore, new goals must be established by January 2020.

Informal meetings were held on June 20 and October 24, 2018, with the FEECA Utilities and interested parties to discuss the current numeric goals proceeding. In an effort to streamline and reduce the need for discovery, our staff recommended, and the parties agreed, to perform a new technical potential study. Further, parties discussed minimum testimony requirements and what level of analysis could be reasonably conducted by the parties within the timeframe of the dockets. On January 15, 2019, seven dockets were established to set numeric conservation goals for each of the FEECA Utilities, the sixth such proceeding.

By Order No. PSC-2019-0062-PCO-EG (Order Establishing Procedure or OEP), issued February 18, 2019, the dockets for each of the FEECA Utilities were consolidated for purposes of hearing and controlling dates and a tentative list of issues was established. The OEP also established minimum testimony requirements for the FEECA Utilities, in order to further streamline the process. For example, the FEECA Utilities were required to provide a base case scenario that included the effect of free-ridership and did not include costs associated with the regulation of carbon dioxide (CO₂) emissions. In their filings, the FEECA Utilities requested residential and commercial/industrial goals for the ten-year period, 2020-2029, as reflected in Attachment A.

¹ Order No. PSC-14-0696-FOF-EU, issued December 16, 2014, in Docket No. 20130199-EI, *In re: Commission review of numeric conservation goals (Florida Power & Light Company)*, Docket No. 20130200-EI, *In re: Commission review of numeric conservation goals (Duke Energy Florida, Inc.)*, Docket No. 20130201-EI, *In re: Commission review of numeric conservation goals (Tampa Electric Company)*, Docket No. 20130202-EI, *In re: Commission review of numeric conservation goals (Gulf Power Company)*, Docket No. 20130203-EM, *In re: Commission review of numeric conservation goals (JEA)*, Docket No. 20130204-EM, *In re: Commission review of numeric conservation goals (Orlando Utilities Commission)*, and Docket No. 20130205-EI, *In re: Commission review of numeric conservation goals (Florida Public Utilities Company)*.

We acknowledged the intervention of the Office of Public Counsel (OPC) on February 26, 2019.² The Southern Alliance for Clean Energy (SACE) was granted leave to intervene on April 17, 2019.³ We acknowledged the intervention of the Florida Department of Agriculture and Consumer Services (FDACS) on April 23, 2019.⁴ The Florida Industrial Power Users Group (FIPUG) was granted leave to intervene on May 22, 2019.⁵ White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (PCS) and Walmart Inc. (Walmart) were granted leave to intervene on May 23, 2019.⁶ ⁷ The Florida League of United Latin American Citizens also known as LULAC Florida Corp. (LULAC) was granted leave to intervene on July 25, 2019.⁸

We held an evidentiary hearing in this matter on August 12 and 13, 2019. We have jurisdiction pursuant to Sections 366.80 through 366.82, F.S.

Decision

Section 366.82(2), F.S., requires us to adopt appropriate goals for increasing the efficiency of energy consumption and increasing the development of demand-side renewable energy systems. We fulfill this duty by adopting residential and commercial/industrial goals and demand-side renewable energy goals for each of the FEECA Utilities.

I. Residential and Commercial/Industrial Goals

Although the evidence and arguments presented in this proceeding indicate that it is necessary to revisit the FEECA process, we recognize our responsibility to review the FEECA Utilities' goals at least every five years. Section 366.82(3), F.S., and Rule 25-17.0021, Florida Administrative Code (F.A.C.), Goals for Electric Utilities, outline the multiple factors we must consider when developing conservation goals.

We have completed our statutorily required review and considered the points set forth in the statute and our rule. Having heard evidence and arguments in this 2019 proceeding, we find that it is in the public interest to continue with the goals set in the last FEECA proceeding pursuant to the 2014 Goalsetting Order. The breakdown of annual goals that we set in 2014 for each of the utilities that will carry forward is included in Attachment B. We will continue the review of the FEECA process for potential revisions as may be appropriate for the forthcoming five-year period.

² Order No. PSC-2019-0080-PCO-EG.

³ Order No. PSC-2019-0137-PCO-EG.

⁴ Order No. PSC-2019-0146-PCO-EG.

⁵ Order No. PSC-2019-0182-PCO-EG.

⁶ Order No. PSC-2019-0185-PCO-EG.

⁷ Order No. PSC-2019-0186-PCO-EG.

⁸ Order No. PSC-2019-0293-PCO-EG.

II. Demand-Side Renewable Energy Goals

FEECA defines demand-side renewable energy as a system located on a customer's premises that uses Florida renewable energy resources to generate thermal or electric energy with the primary intent to offset all or part of the customer's electricity requirements up to 2 megawatts. When developing goals to increase the development of demand-side renewable energy, we must consider the multiple factors outlined in Section 366.82(3), F.S., and Rule 25-17.0021, F.A.C., as measured against cost-effectiveness.

As required by statute, we have completed our review of the FEECA Utilities' demand-side renewable energy goals. Our discussion and decision regarding the appropriate goals to set in this proceeding are reflected below.

A. Applicable Law

Section 366.81, F.S., states:

The Legislature finds and declares that it is critical to utilize the most efficient and cost-effective demand-side renewable energy systems and conservation systems in order to protect the health, prosperity, and general welfare of the state and its citizens.

* * *

Since solutions to our energy problems are complex, the Legislature intends that the use of solar energy, renewable energy sources, highly efficient systems, cogeneration, and load-control systems be encouraged.

B. Parties' Arguments

The FEECA Utilities all agreed that no goals or goals of zero should be established because none of their identified demand-side renewable energy system measures proved to be cost-effective. FPL witness Koch argued that the goals for the demand-side renewable energy systems should be set at zero because none of the demand-side renewable energy measures proved to be cost-effective in either the Rate Impact Measure (RIM) or Total Resource Cost (TRC) tests.⁹ TECO witness Roche also testified that "[t]he residential and commercial renewable energy systems were both screened out without any program administration or incentive costs so they will not pass cost-effectiveness as a [demand-side management or DSM] program." FPL argued that zero goals beyond the provisions included in Rule 25-6.065, F.A.C., Interconnection and Net Metering of Customer-Owned Renewable Generation (Net Metering Rule), is consistent with our decision in the 2014 DSM Goals docket.

⁹ The RIM and TRC tests are defined by Rule 25-17.008, F.A.C., and determine if a demand-side management measure is economic for the general body of ratepayers.

SACE and LULAC argued that zero is not a goal for demand-side renewable energy. SACE and LULAC proposed that “the utilities adopt a pilot program investing in [photovoltaic or PV] solar installations coupled with battery storage at schools that are designated as storm shelters.” According to SACE and LULAC, “[s]olar plus battery storage allows a facility, like a school that is designated as a shelter, to generate its own power, independent of the grid, allowing it to provide power for critical needs, such as medical equipment, cooling, lighting, and charging cell phones.”

OPC stated that it did not take a position on what goals should be established for increasing the development of demand-side renewable energy systems since none of the renewables pass TRC or RIM. However, OPC asserted that “[t]he companies' proposed goals should adequately safeguard the interests of the general body of ratepayers against undue rate impacts while achieving the intent of [FEECA].”

In its brief, FDACS stated that “[t]he Legislature has declared that it is critical to utilize the most efficient and cost-effective demand-side renewable energy systems.” FDACS continued, “[t]he Commission should encourage the FEECA Utilities to seek out innovative research and development programs to develop new measures and programs that assist customers with conserving their energy consumption while enabling utilities to shifting [sic] peak energy demand.” PCS, Walmart, and FIPUG took no position on the establishment of demand-side renewable energy goals.

C. Analysis

In 2008, the Legislature amended Section 366.82(2), F.S., to require us to adopt appropriate goals for increasing the development of demand-side renewable energy systems. Since that time, none of the identified or proposed demand-side renewable energy measures have passed the cost-effectiveness analysis, but we have consistently encouraged the development of demand-side renewable energy.

In the 2009 Goalsetting Order, we found:

None of [the demand-side renewable measures] were found to be cost-effective in the utilities' analyses. However, we can meet the intent of the Legislature to place added emphasis on these resources, while protecting ratepayers from undue rate increases by requiring the [investor-owned utilities or IOUs] to offer renewable programs subject to an expenditure cap. We direct the IOUs to file pilot programs focusing on encouraging solar water heating and solar PV technologies in the DSM program approval proceeding. Expenditures allowed for recovery shall be limited to 10 percent of the average annual recovery through the Energy Conservation Cost Recovery clause in the previous five years.... Utilities are encouraged to design programs that take advantage of unique cost-saving

opportunities, such as combining measures in a single program, or providing interested customers with the option to provide voluntary support.¹⁰

In the 2014 Goalsetting Order, we found that the pilot programs implemented by the FEECA Utilities “are not cost-effective and experience gained since the last goals proceeding indicates that consumers have continued to install systems without any rebates.” We also stated:

Each of the IOUs should continue to implement the provisions of Rule 25-6.065, F.A.C., Interconnection and Net Metering of Customer-Owned Renewable Generation. The rule is an appropriate means to encourage the development of demand-side renewable energy, as it expedites the interconnection of customer-owned renewable energy systems and benefits participating customers through net metering.¹¹

We find that the record in the current proceeding also indicates that demand-side renewable energy systems are not cost-effective using either the RIM or the TRC test. However, the installation of demand-side renewable energy systems continues to grow without any utility incentives. Such growth indicates that our Net Metering Rule is an appropriate mechanism to encourage the development of these systems.

1. Net Metering

Net metering is defined in Section 366.91(2)(c), F.S., as a “metering and billing methodology whereby customer-owned renewable generation is allowed to offset the customer’s electricity consumption on site.” The Net Metering Rule lays out the groundwork for the public utilities’ implementation of their net metering programs. Customers are able to use the energy they generate from solar PV panels to offset their energy usage. Excess energy produced is delivered to the electric grid and customers receive credit toward the next month’s bills. At the end of the year, utilities are required to pay customers for any unused energy credits.

Gulf witness Floyd testified that demand-side renewable energy systems are growing tremendously in Gulf’s territory. Witness Floyd also stated that “customers are receiving the benefits of energy efficiency and demand-side renewables in the market in the most-efficient way without unnecessary incentives.” Witness Floyd asserted that the Net Metering Rule creates a good, understood model for the customer. Witness Floyd testified that there are “more solar providers in Gulf’s service area,” which naturally creates competition. Witness Floyd further

¹⁰ Order No. PSC-09-0855-FOF-EG, issued December 30, 2009, in Docket No. 20080407-EG, *In re: Commission review of numeric conservation goals (Florida Power & Light Company)*, Docket No. 20080408-EG, *In re: Commission review of numeric conservation goals (Progress Energy Florida, Inc.)*, Docket No. 20080409-EG, *In re: Commission review of numeric conservation goals (Tampa Electric Company)*, Docket No. 20080410-EG, *In re: Commission review of numeric conservation goals (Gulf Power Company)*, Docket No. 20080411-EG, *In re: Commission review of numeric conservation goals (Florida Public Utilities Company)*, Docket No. 20080412-EG, *In re: Commission review of numeric conservation goals (Orlando Utilities Commission)*, and Docket No. 20080413-EG, *In re: Commission review of numeric conservation goals (JEA)*, p. 29.

¹¹ Order No. PSC-14-0696-FOF-EU at p. 48.

testified that “[d]emand-side renewables have experienced tremendous growth since the end of the utility incentives in 2015.”

DEF witness Cross testified that “Florida currently ranks among the top ten states based on the cumulative amount of solar electric capacity installed.” Witness Cross agreed with other FEECA utilities that “[t]he cost to install solar has dropped significantly in recent years” and with those costs declining, utilities are “seeing continued growth in the number of customers installing demand-side renewable [energy] systems on their own, without incentives from the utility.”

As more households embrace renewable energy, the demand will stimulate more business competition and drive the cost of using or owning renewable energy, such as solar, down. Since 2008, customer-owned solar PV installations have steadily increased throughout the state. As seen in the table below, 23,120 customer-owned solar PV installations have been added by the four largest IOUs between 2017 and 2019. These solar installations are primarily from residential and business customers.

Number of Solar PV Installations				
Utility	2017	2018	2019*	Total
FPL	2,163	3,825	2,250	8,238
DEF	3,025	5,079	2,949	11,053
TECO	740	1,268	829	2,837
Gulf	382	297	313	992
Total	6,310	10,469	6,341	23,120

*2019 figures do not include a full year of data.

Thus, the current Net Metering Rule has contributed to the increasing demand for customer-owned renewable generation.

2. SACE and LULAC’s Pilot Program

SACE and LULAC did not sponsor any testimony related to demand-side renewable energy goals but proposed a demand-side renewable energy goal in their brief that they believe would meet the demand-side renewable energy goal requirements of FEECA. The proposal included solar PV and battery installations at schools to be implemented through a five-year pilot program. The proposed pilot program, however, was not supported by competent and substantial evidence that demonstrated cost-effectiveness. Additionally, witness Floyd testified that the cost of battery storage is still too high to be considered cost-effective. Thus, SACE and LULAC’s proposed pilot program shall not be approved at this time.

D. Conclusion

Based upon the evidence in the record, we find that none of the demand-side renewable energy measures identified by the parties are cost-effective. Evidence in the record further shows that Rule 25-6.065, F.A.C., is an effective means of encouraging the development of demand-side renewable energy systems that allow participants to offset their energy usage. Therefore, we find that the FEECA Utilities' continued implementation and compliance with Rule 25-6.065, F.A.C., is an appropriate goal in this proceeding.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that the FEECA Utilities' numeric conservation goals are hereby approved as set forth in Attachment B. It is further

ORDERED that the FEECA Utilities shall continue to implement Rule 25-6.065, F.A.C. It is further

ORDERED that within 90 days of the issuance of this Order, the FEECA Utilities shall file individual demand-side management plans designed to meet their approved goals. It is further

ORDERED that these dockets shall be closed after the time for filing an appeal has run.

By ORDER of the Florida Public Service Commission this 26th day of November, 2019.



ADAM J. TEITZMAN
Commission Clerk
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Copies furnished: A copy of this document is provided to the parties of record at the time of issuance and, if applicable, interested persons.

MAD

COMMISSIONER CLARK CONCURS WITH OPINION:

Commissioner Clark, concurring.

This proceeding presents the Commission with a difficult balancing act. We must seek to obtain the most value for Floridians by ensuring that conservation and efficiency measures are widely implemented, and by requiring utilities to pursue such measures. At the same time, we must be cautious to not require programs that benefit some utility customers to the detriment of many who are unable to participate. The Commission is often tasked with balancing important policy goals that are in tension and we must strike a balance that is best for the State of Florida. I believe that we have done so here.

I concur with the order in this proceeding, but I must emphasize that the numeric conservation goals adopted in Order No. PSC-14-0696-FOF-EU, issued December 16, 2014, were based on exclusion of utility incentives. I note that this Commission has never implemented that provision of the statute, and with this understanding, I concur.

CHAIRMAN GRAHAM DISSENTS WITH OPINION:

Chairman Graham dissents with opinion from the Commission's decision that the 2014 goals can be retained, as follows:

Section 366.82, F.S. requires the Commission to review the goals not less often than every five years, and directs that "the commission shall determine what further goals, programs, or plans are warranted and adopt them." The Commission has consistently held this to require developing an evidentiary record and setting goals based on that record.

With a statutory mandate to set the goals every five years, and with the expiration of that period imminent, continuing the 2014 goals is expressly not an option available to the Commission.

In retaining the 2014 goals, the Commission asserts it has considered the evidentiary record in this proceeding and chose to keep the existing goals in place, noting they are supported by the record of the previous goals proceeding. The statutory requirement to set goals this year cannot be met, however, by going through the motions of "considering" the evidentiary record of the current proceeding and, unwilling to accept an outcome supported by that record, keeping in place goals founded on facts and circumstances that existed five years earlier. By requiring a review of the goals at least every five years, the statute explicitly establishes the insufficiency of five year old goals that are supported by a five year old evidentiary record.

Similarly, the rationale that the 2014 goals had a 10 year horizon fails to address the unambiguous statutory requirement that the goals be reviewed and adopted every five years and

that the goals that are adopted should be based on the evidentiary record developed during the most recent review.

The 2014 goals are not compatible with the evidentiary record in the current proceeding. They are outside the realm of the credible testimony, and particularly run afoul of FDACS' filed comments, required by 366.82(5), F.S., regarding achievement of "a least-cost strategy, including nonutility programs" and "the impact of state and local building codes and appliance efficiency standards on the need for utility-sponsored conservation and energy efficiency measures and programs."

The record in this proceeding clearly establishes that much of the economic potential that existed five years ago has been eliminated by the steady march of increasing energy efficiency required by building codes and appliance standards, and it was further eroded by the achievements of the programs established under the Commission's 2014 goals.

Improperly keeping 2014 goals, which far exceed what currently can be justified under the RIM test, has material consequences. Utilities will be forced to submit programs that will be far more expensive over the coming five years than meeting these goals has been to date, with customers paying substantially higher rates to offset the plummeting cost-effectiveness of the programs.

Worse, giving short shrift to legislative direction to consider the costs and benefits to the general body of ratepayers, and disregarding the statutorily required consideration of the greatly diminished need for incentives, have a "reverse Robin Hood effect" on low-income customers.

Already facing a greater financial vulnerability to higher utility bills, these low-income customers also have lower rates of homeownership, leaving them disproportionately unable to take advantage of most programs, including mainstays such as high-efficiency water heaters, air conditioning units, windows, and insulation. Low-income customers will be paying higher rates to fund excessively costly programs that provide incentive payments and bill savings predominantly to those who can afford homeownership.

Although I agree that greater conservation is a desirable social objective, the staff recommendation contains the appropriate goals under current state law and Commission precedent, and I therefore respectfully dissent from the Commission's decision.

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by the Commission's final action in this matter may request: 1) reconsideration of the decision by filing a motion for reconsideration with the Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code; or 2) judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water and/or wastewater utility by filing a notice of appeal with the Office of Commission Clerk, and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

**FEECA UTILITIES' PROPOSED RESIDENTIAL AND
COMMERCIAL/INDUSTRIAL GOALS**

FPL Proposed Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	24.0	20.7	0.012	11.2	5.1	0.091
2021	24.0	20.7	0.012	11.2	5.1	0.091
2022	24.0	20.7	0.012	11.2	5.1	0.091
2023	24.0	20.7	0.012	11.2	5.1	0.091
2024	24.0	20.7	0.012	11.2	5.1	0.091
2025	24.0	20.7	0.012	11.2	5.1	0.091
2026	24.0	20.7	0.012	11.2	5.1	0.091
2027	24.0	20.7	0.012	11.2	5.1	0.091
2028	24.0	20.7	0.012	11.2	5.1	0.091
2029	24.0	20.7	0.012	11.2	5.1	0.091

DEF Proposed Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	14	10	17	16	14	8
2021	13	9	15	13	13	8
2022	12	8	14	11	11	8
2023	11	8	12	12	12	8
2024	11	8	12	14	13	7
2025	10	8	11	14	13	5
2026	10	7	10	13	11	3
2027	9	7	9	13	11	2
2028	9	7	8	14	12	1
2029	9	6	7	15	11	1

TECO Proposed Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	4.7	2.6	9.3	2.7	1.9	5.5
2021	4.9	2.6	9.6	2.5	1.7	6.5
2022	5.0	2.6	9.7	2.4	1.6	5.5
2023	5.2	2.6	10.0	2.9	2.0	6.5
2024	5.4	2.6	10.3	2.4	1.6	5.6
2025	5.6	2.5	10.7	2.5	1.8	6.7
2026	5.8	2.5	11.0	2.8	1.9	5.8
2027	6.0	2.5	11.3	2.6	1.8	6.8
2028	5.6	2.5	10.5	2.4	1.7	5.8
2029	6.0	2.5	11.3	2.6	1.8	6.8

Gulf Proposed Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	0	0	0	1	1	0
2021	0	0	0	1	1	0
2022	0	0	0	1	1	0
2023	0	0	0	1	1	0
2024	0	0	0	1	1	0
2025	0	0	0	2	1	0
2026	0	0	0	2	1	0
2027	0	0	0	2	1	0
2028	0	0	0	2	1	0
2029	0	0	0	2	2	0

FPUC Proposed Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	0	0	0	0	0	0
2021	0	0	0	0	0	0
2022	0	0	0	0	0	0
2023	0	0	0	0	0	0
2024	0	0	0	0	0	0
2025	0	0	0	0	0	0
2026	0	0	0	0	0	0
2027	0	0	0	0	0	0
2028	0	0	0	0	0	0
2029	0	0	0	0	0	0

JEA Proposed Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	0	0	0	0	0	0
2021	0	0	0	0	0	0
2022	0	0	0	0	0	0
2023	0	0	0	0	0	0
2024	0	0	0	0	0	0
2025	0	0	0	0	0	0
2026	0	0	0	0	0	0
2027	0	0	0	0	0	0
2028	0	0	0	0	0	0
2029	0	0	0	0	0	0

OUC Proposed Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	0	0	0	0	0	0
2021	0	0	0	0	0	0
2022	0	0	0	0	0	0
2023	0	0	0	0	0	0
2024	0	0	0	0	0	0
2025	0	0	0	0	0	0
2026	0	0	0	0	0	0
2027	0	0	0	0	0	0
2028	0	0	0	0	0	0
2029	0	0	0	0	0	0

**COMMISSION APPROVED RESIDENTIAL AND
COMMERCIAL/INDUSTRIAL GOALS**

FPL Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	26.9	16.7	25.0	26.2	16.1	28.7
2021	27.3	16.9	25.7	26.6	16.5	30.1
2022	27.6	17.2	26.5	27.1	16.9	31.6
2023	28.0	17.5	27.4	27.5	17.3	33.1
2024	28.5	17.8	28.3	28.0	17.7	34.7

DEF Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	15.5	32.2	9.3	8.2	5.2	5.9
2021	13.7	27.8	6.2	6.9	4.8	3.9
2022	12.2	24.5	3.8	6.0	4.7	2.4
2023	11.3	22.3	2.2	5.6	5.0	1.4
2024	10.7	20.9	1.2	5.0	4.6	0.8

TECO Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	3.3	7.6	7.4	3.5	1.7	10.3
2021	3.3	8.0	7.7	3.6	1.9	10.4
2022	3.0	7.4	6.9	3.3	1.9	10.2
2023	2.9	6.8	6.3	3.5	1.8	9.9
2024	2.5	6.1	5.5	3.2	1.7	9.6

Gulf Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	6.7	3.8	6.8	0.8	0.2	2.5
2021	7.5	4.3	7.6	0.9	0.2	2.7
2022	8.1	4.6	8.3	0.9	0.3	3.0
2023	8.8	5.0	8.9	1.0	0.3	3.2
2024	9.3	5.3	9.5	1.1	0.3	3.4

FPUC Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	0.089	0.028	0.060	0.052	0.018	0.168
2021	0.099	0.031	0.067	0.058	0.018	0.182
2022	0.107	0.034	0.073	0.058	0.027	0.202
2023	0.117	0.036	0.078	0.065	0.027	0.215
2024	0.123	0.039	0.084	0.071	0.027	0.229

JEA Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	0.94	0.96	2.5	0.14	0.007	0.08
2021	0.94	0.96	2.5	0.14	0.007	0.08
2022	0.94	0.96	2.5	0.14	0.007	0.08
2023	0.94	0.96	2.5	0.14	0.007	0.08
2024	0.94	0.96	2.5	0.14	0.007	0.08

OUC Annual Conservation Goals

Year	Residential			Commercial/Industrial		
	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)	Summer Peak Demand (MW)	Winter Peak Demand (MW)	Annual Energy Consumption (GWh)
2020	0.21	0.21	0.77	0.39	0.70	0.85
2021	0.21	0.22	0.80	0.40	0.78	0.86
2022	0.19	0.20	0.72	0.37	0.78	0.85
2023	0.19	0.18	0.66	0.39	0.74	0.82
2024	0.16	0.16	0.57	0.36	0.70	0.80