FILED APR 02, 2014 DOCUMENT NO. 01501-14 FPSC - COMMISSION CLERK

Hopping Green & Sams

Attorneys and Counselors

Writer's Direct Dial No. (850) 425-2359

April 2, 2014

BY HAND DELIVERY

Carlotta S. Stauffer, Director Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

RECEIVED-FPSC APR -2 PM 4:

Re: In re: Commission review of numeric conservation goals (JEA), Docket No. 130203-EM

Dear Ms. Stauffer:

Enclosed for filing on behalf of JEA in the above docket are the original and fifteen copies of the following:

- JEA's Petition for Approval of Numeric Conservation Goals; and
- Pre-filed Panel Testimony of **Richard J. Vento** and **Donald P. Wucker**, along with attached Exhibit Nos. [RJV-1] [DPW-1], and [JEA-1] through [JEA-6].

By copy of this letter, the enclosed documents have been furnished to the parties on the attached certificate of service by electronic mail.

Please acknowledge receipt and filing of the above by stamping the enclosed extra copies of the Petition and testimony and return them to me. If you have any questions concerning this filing, please contact me at 425-2359.

Thank you for your assistance in connection with this matter.

Very truly yours,

HOPPING GREEN & SAMS, P. Bv: Gary V. Perko Brooke E. Lew

Attorneys for JEA

GVP/mee Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals (Florida Power & Light Company).	DOCKET NO. 130199-EI			
In re: Commission review of numeric conservation goals (Duke Energy Florida, Inc.).	DOCKET NO. 130200-EI	COMM	14 APR -2	RECEIVED
In re: Commission review of numeric conservation goals (Tampa Electric Company).	DOCKET NO. 130201-EI	COMMISSION CLERK	PM 4:	ED-FPSC
In re: Commission review of numeric conservation goals (Gulf Power Company).	DOCKET NO. 130202-EI		37	SC
In re: Commission review of numeric conservation goals (JEA).	DOCKET NO. 130203-EM			
conservation goals (JEA).	DATED: April 2, 2014			

JEA'S PETITION FOR APPROVAL OF NUMERIC CONSERVATION GOALS

JEA, by and through its undersigned attorneys, files this petition with proposed numeric conservation goals and requests that the Florida Public Service Commission ("Commission") accept, approve and adopt JEA's proposed goals pursuant to section 366.82, Florida Statutes, and Rules 25-17.001 and 25-17.0021, Florida Administrative Code. In support, JEA states:

1. JEA is subject to section 366.82, Florida Statutes, part of the Florida

Energy Efficiency and Conservation Act ("FEECA"), which requires the Commission to adopt

and periodically review goals to increase the efficiency of energy consumption, increase the

development of demand side renewable energy systems, reduce and control the growth rates of

electric consumption and weather sensitive peak demand, and encourage the development of

ECO ______ demand side renewable energy resources.

GCL 1. All notices, pleadings and other communications required to be served on the IDM petitioner should be directed to:

CLK

COM

AFD

APA

Gary V. Perko, Esquire Brooke E. Lewis, Esquire Hopping Green & Sams, P.A. 119 S. Monroe St., Suite 300 P.O. Box 6526 (32314) Tallahassee, FL 32301 gperko@hgslaw.com blewis@hgslaw.com

2. The panel testimony of Richard J. Vento and Donald P. Wucker filed contemporaneously with this petition explains the methodology by which JEA's proposed goals were derived and, along with the exhibits attached to the testimony, satisfy the minimumfiling requirements established in the Order Consolidating Dockets and Establishing Procedure entered on August 19, 2013. *See* Order No. PSC-13-0386-PCO-EU.

3. As discussed in the panel testimony of Mr. Vento and Mr. Wucker, JEA utilized the same methodology used in the 2009 goal-setting proceeding to identify and evaluate potential conserviation measures. Based on the results of those evaluations, JEA proposes FEECA goals of 0 MW (summer and winter) and 0 MWh (annual energy) for both the residential and commercial/industrial classes. As Mr. Vento and Mr. Wucker further discuss, however, JEA is in the process of revising its conservation program offerings to determine the approprite level of investment in any non-RIM based measures based upon JEA Board policy.

4. JEA knows of no material facts in dispute regarding the relief requested herein.

WHEREFORE, JEA requests that the Florida Public Service Commission enter an order approving and establishing the Company's proposed numeric conservation goals for the period 2015 through 2024 pursuant to section 366.82, Florida Statutes, and Rule 25-17.0021, Florida Administrative Code, and grant such other relief as is just and reasonable under the facts and law as determined by the Commission.

2

Respectfully submitted this <u>2nd</u> day of April, 2014.

in

Gary V. Perko (Fla. Bar No. 855898) Brooke E. Lewis (Fla. Bar No. 710881) HOPPING GREEN & SAMS, P.A. P.O. Box 6526 119 S. Monroe Street, Suite 300 (32301) Tallahassee, FL 32314 Phone: 850.222.7500 Fax: 850.224.8551 gperko@hgslaw.com blewis@hgslaw.com

Attorneys for JEA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this <u>2nd</u> day of April, 2014, to the following:

Florida Public Service Commission

Charles Murphy Lee Eng Tan 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850 cmurphy@psc.state.fl.us ltan@psc.state.fl.us

Florida Department of Agriculture and Consumer Services

Steven L. Hall, Senior Attorney 407 South Calhoun Street, Suite 520 Tallahassee, FL 32399 Steven.Hall@FreshFromFlorida.com

Florida Power & Light Company

John Butler/Jessica Cano 700 Universe Blvd Juno Beach, FL 33408 John.Butler@FPL.com Jessica.cano@fpl.com

Florida Power & Light Company

Kevin Donaldson 4200 West Flagler Street Miami, FL 33134 kevin.donaldson@fpl.com

Duke Energy Florida

Dianne M. Triplett Matthew R. Bernier Post Office Box 14042 St. Petersburg, Florida <u>dianne.triplett@duke-energy.com</u> matthew.bernier@duke-energy.com

Duke Energy Florida

Mr. Paul Lewis, Jr. 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740 paul.lewisjr@duke-energy.com

Tampa Electric Company

Paula K. Brown, Manager P.O. Box 111 Tampa, FL 33602 pkbrown@tecoenergy.com

Tampa Electric Company

c/o J. Beasley/J. Wahlen/A. Daniels Post Office Box 391 Tallahassee, FL 32302 jbeasley@ausley.com adaniels@ausley.com

JEA

Mr. P. G. Para 21 West Church Street, Tower 16 Jacksonville, FL 32202-3158 parapg@jea.com

Gulf Power Company

Robert L. McGee, Jr. One Energy Place Pensacola, FL 32520-0780 rlmcgee@southernco.com

Gulf Power Company

c/o S. Griffin P.O. Box 12950 Pensacola, FL 32591-2950 <u>srg@beggslane.com</u>

Sierra Club

Diana Csank 50 F St. NW, 8th Floor Washington, DC 20001 Diana.Csank@sierraclub.org

Florida Industrial Power Users Group

c/o Jon C. Moyle, Jr./Karen Putnal 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com Southern Alliance for Clean Energy Alisa Coe 111 S. Martin Luther King Jr. Blvd. Tallahassee, Florida 32301 acoe@earthjustice.org

Southern Alliance for Clean Energy

George Cavros 120 E. Oakland Park Blvd., Suite 105 Fort Lauderdale, FL 33334 george@cavros-law.com

Walmart

Robert Scheffel Wright John T. LaVia, III 1300 Thomaswood Drive Tallahassee, Florida 32308 <u>schef@gbwlegal.com</u> jlavia@gbwlegal.com

Attorney