

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
In re: Commission review of numeric conservation goals (Tampa Electric Company).	DOCKET NO. 130201-EI
In re: Commission review of numeric conservation goals (Gulf Power Company).	DOCKET NO. 130202-EI
In re: Commission review of numeric conservation goals (JEA).	DOCKET NO. 130203-EM
In re: Commission review of numeric conservation goals (Orlando Utilities Commission).	DOCKET NO. 130204-EM
In re: Commission review of numeric conservation goals (Florida Public Utilities Company).	DOCKET NO. 130205-EI

**FLORIDA STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE'S PREHEARING STATEMENT**

The Florida State Conference of the National Association for the Advancement of Colored People hereby files with the Florida Public Service Commission its Prehearing Statement in connection with the proceedings in above referenced dockets, and states the following:

I. STATEMENT OF BASIC POSITION

In general, the NAACP wants the Commission to approve a demand side management policy that not only meets Florida's social policy goals for a clean environment but also ensures

affordable utility rates for Florida's economically disadvantaged consumers by avoiding regressive ratemaking outcomes that result in low-income ratepayers bearing a disproportionate amount of the costs to maintain Florida's public utility infrastructure.

The NAACP has an interest in seeing that the Commission ensures that as a result of the above proceedings that low income consumers receive the lowest rates possible. This goal can be achieved by implementing a demand side management program where the effectiveness and efficiency of the program is properly evaluated by considering the costs and the benefits incurred by participants and non-participants in a demand side management program. By applying these factors, the Commission can go a long way in ensuring that low-income consumers do not bear a disproportionate share of the costs associated with maintaining fixed infrastructure.

In addition, the NAACP wants the Commission to assess utility conservation goals based on the record before it and if the Commission were to take this approach, the Commission should find that it is not in the interest of non-participating consumers that the Commission increase utility-sponsored demand side management goals.

The economic interests of low-income consumers are furthered by effective renewable energy programs. Low-income consumers will benefit most from the savings seen in their utility bills and may also benefit from the entrepreneurial opportunities demand side management programs introduce. It would not be in the interest of low-income consumers to face higher costs due to regressive renewable energy policy.

II. ISSUES AND POSITIONS

Issue 1: Are the Company's proposed goals based on an adequate assessment of the full technical potential of all available demand-side and supply-side conservation and efficiency measures, including demand-side renewable energy systems, pursuant to Section 366.82(3), F.S.?

NAACP: No position at this time.

Issue 2: Do the Company's proposed goals adequately reflect the costs and benefits to customers participating in the measure, pursuant to Section 366.82(3)(a), F.S.?

NAACP: Public policy emanating from the DSM proceedings should maintain the social policy of affordable utility rates, avoid regressive pricing, and mitigate the negative impact of shifting the burden of costs of participating consumers onto non-participating consumers-the most vulnerable and disadvantaged customers.

Issue 3: Do the Company's proposed goals adequately reflect the costs and benefits to the general body of rate payers as a whole, including utility incentives and participant contributions pursuant to Section 366.82(3)(b), F.S.?

NAACP: In reply, public policy emanating from the DSM proceedings should maintain the social policy of affordable utility rates, avoid regressive pricing, and mitigate the negative impact of shifting the burden of costs of participating consumers onto non-participating consumers-the most vulnerable and disadvantaged customers.

Issue 4: Do the Company's proposed goals adequately reflect the need for incentives to promote both customer-owned and utility-owned energy efficiency and demand-side renewable energy systems, pursuant to Section 366.82, F.S.?

NAACP: No position at this time.

Issue 5: Do the Company's proposed goals adequately reflect the costs imposed by state and federal regulations on the emission of greenhouse gases, pursuant to Section 366.82(3)(d), F.S.?

NAACP: No position at this time.

Issue 6: What cost-effectiveness test or tests should the Commission use to set goals, pursuant to Section 366.82, F.S.?

NAACP: No position at this time.

Issue 7: Do the Company's proposed goals appropriately reflect consideration of free riders?

NAACP: No position at this time.

Issue 8: What residential summer and winter megawatt (MW) and annual Gigawatt-hour (GWh) goals should be established for the period 2015-2024?

NAACP: In reply, the Commission should maintain the social policy of affordable utility rates, avoid regressive pricing, and mitigate the negative impact of shifting the burden of costs of participating consumers onto non-participating consumers-the most vulnerable and disadvantaged customers.

Issue 9: What commercial/industrial summer and winter megawatt (MW) and annual Gigawatt hour (GWh) goals should be established for the period 2015-2024?

NAACP: In reply, the Commission should maintain the social policy of affordable utility rates, avoid regressive pricing, and mitigate the negative impact of shifting the burden of costs of participating consumers onto non-participating consumers-the most vulnerable and disadvantaged customers.

Issue 10: What goals, if any, should be established for increasing the development of demand-side renewable energy systems, pursuant to Section 366.82(2), F.S.?

NAACP: No position at this time.

Issue 11: Should the Company's existing Solar Pilot Programs be extended and, if so, should any modifications be made to them?

NAACP: No. The testimony filed by the parties indicates at this time that the solar pilot programs are economically regressive and shifts costs to non participants and should not be extended.

III. STIPULATED ISSUES

There are no stipulated issues at this time.

IV. PENDING MOTIONS

The NAACP has one pending motion before the Commission at this time. In this motion we ask the Commission to accept this late filed pre-hearing statement. In addition, the NAACP's petition to intervene remains pending before the hearing officer.

V. PENDING REQUESTS FOR CONFIDENTIAL CLASSIFICATION

There are no pending requests for confidential classification this time.

VI. OBJECTION TO WITNESS' QUALIFICATIONS

There are no objections to witness' qualifications at this time.

VII. REQUIREMENTS OF THE PREHEARING ORDER THAT CANNOT BE MET

At this time, the NAACP is not aware of any requirements in the Order Establishing Procedure with which it cannot comply.

RESPECTFULLY SUBMITTED, this 24th day of June 2014

s/ Alton E. Drew

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on
this 24th day of June, 2014 via the Internet on:

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