



# Public Service Commission

**-M-E-M-O-R-A-N-D-U-M-**

FILE COPY

**DATE:** May 9, 1995  
**TO:** Parties to IOU Electric Utility Conservation Program Dockets Nos. 941170-EG, 941171-EG, 941172-EG & 941173-EG  
**FROM:** Joseph D. Jenkins, Director *MP*  
Division of Electric and Gas  
**RE:** Staff Communications

Although staff communications Rule 25-22.033 does not apply to PAA dockets, I am none-the-less hereby informing current and potential parties of communications received from the following:

1. Tampa Electric Company. Docket No. 941173-EG. On May 4, 1995, I received a letter saying the Commission does not need to rule the many measurement issues raised by LEAF; that excluding or including "free riders" from program savings should be consistent with how "free riders" are treated in the goals; and there is no need for an annual formal review process. The letter is on file with Records and Reporting.

cc:

Records and Reporting  
Palecki  
Trapp  
EAG Bureau Chiefs

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CHM \_\_\_\_\_  
CIR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG \_\_\_\_\_  
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DOCUMENT NUMBER-DATE

04542 MAY 10 1995

FPSC-RECORDS/REPORTING

MACFARLANE AUSLEY FERGUSON & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

MAY 4 1995

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May 4, 1995

HAND DELIVERED

IN REPLY REFER TO:

Tallahassee

Mr. Joseph D. Jenkins, Director  
Division of Electric & Gas  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0850

Re: Approval of Demand-Side Management Plan for  
Tampa Electric Company; Docket No. 941173-EG

Dear Mr. Jenkins:

I received a copy of Ms. Deb Swim's letter to you dated April 17, 1995 on behalf of the Legal Environmental Assistance Foundation, along with the written comments and other voluminous attachments which accompanied that letter. On behalf of Tampa Electric I offer the following brief responsive comments:

- ▶ With respect to monitoring and evaluating plans, Tampa Electric believes that the existing reporting requirements of Fla. Admin. Code Rule 25-17.0021 will provide adequate data for monitoring and evaluating program performance. This rule requires that proposed utility conservation programs be accompanied on the front end by very detailed information regarding the operation and administration of the program as well as detailed assumptions and estimates of what the program is expected to achieve. The utility is also required to submit a methodology for measuring actual KW and KWH savings from the program, including a description of research design, instrumentation, use of control groups, and other details sufficient to ensure that results are valid. In addition, the rule requires that utilities submit an annual report not later than March 1 of each year detailing their actual DSM results for the previous calendar year. Thus, the Commission has in place very detailed rule provisions which will enable it to carefully monitor and evaluate program performance.
- ▶ With respect to the treatment of "free riders," Tampa Electric initially submitted its plan with the demand and energy reductions associated with free riders removed

MACFARLANE AUSLEY FERGUSON & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

MAY 4 1995

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May 4, 1995

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IN REPLY REFER TO

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Florida Public Service Commission  
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Mr. Joseph D. Jenkins  
May 4, 1995  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing letter to Joseph D. Jenkins, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (\*) on this 4<sup>th</sup> day of May, 1995 to the following:

Mr. Michael A. Palecki\*  
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Florida Public Service  
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ATTORNEY