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080410-EG

From: Rogers, Mallory [MAROGER@SOUTHERNCO.COM]
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Attachments: 080410-EG Gulf's Motion for Reconsideration.pdf

080410-EG
If's Motion for R

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B. Docket No. 080410-EG

C. Gulf Power Company

D. Document consists of 14 pages.

E. The attached document is Gulf's Motion for Reconsideration.

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GULF POWER
A SOUTHERN COMPANY

January 14, 2010

Mrs. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee FL 32399

Dear Mrs. Cole:

Re: Docket No. 080410-EG

Enclosed is Gulf Power Company's Motion for Reconsideration in the above referenced docket.

Sincerely,

Susan D. Ritenour (lw)

mr

Enclosures

cc: Beggs & Lane
Jeffrey A. Stone, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Commission Review of Numeric Conservation Goals for Gulf Power Company**

Docket No.: **080410-EG**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U. S. mail this 14th day of January, 2010, on the following:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals (Gulf Power Company)	Docket No.:	080410-EG
	Filed:	January 14, 2010

/

GULF POWER COMPANY'S MOTION FOR RECONSIDERATION

Gulf Power Company, by and through its undersigned counsel, and pursuant to Rule 25-22.060, Florida Administrative Code, respectfully requests that the Commission reconsider certain aspects of its decision memorialized in Order No. PSC-09-0855-FOF-EG issued on December 30, 2009, and states as follows:

1. On December 30, 2009, the Commission entered Order No. PSC-09-0855-FOF-EG which established numeric conservation goals for the "FEECA" utilities, including Gulf Power Company.

2. Through its Order, the Commission established the following numeric goals for Gulf Power:

Residential: Summer (MW) 118.90; Winter (MW) 100.50; and Annual Energy 475.9 (GWh).

Commercial/Industrial: Summer (MW); 25.30; Winter (MW) 9.30; and Annual Energy (GWh) 97.90

3. Gulf Power respectfully requests that the Commission reconsider one aspect of its decision. Reconsideration is proper where the Commission overlooked or failed to consider specific facts or points of law in rendering its Order. See, In re: Petition of Rate Increase by Tampa Electric Company, 2009 WL 2589104 (Fla. P.S.C. Aug. 21, 2009) (citing Stewart Bonded Warehouse, Inc. v. Bevis, 294 So.2d 315 (Fla. 1974); Diamond Cab Co. v. King, 146 So.2d 889 (Fla. 1962) and Pingree v. Quaintance, 394 So.2d 161 (Fla. 1st DCA 1981)).

4. In establishing Gulf Power's residential numeric conservation goals, the Commission included energy and demand savings associated with the eight residential "Two-Year Payback Measures" identified by Gulf Power in Late Filed Exhibit No. 2 to the Deposition of Gulf Power witness John Floyd. [Item 10 of Exhibit #4 to Staff's Comprehensive Exhibit List] See, Order No. PSC-09-0855-FOF-EG at p. 20. A true and correct copy of Mr. Floyd's Late Filed Exhibit No. 2 is attached hereto as Exhibit "A" for ease of reference. To Gulf Power's knowledge, this late-filed exhibit is the only record evidence specifically addressing energy and demand savings associated with these Two-Year Payback Measures as they relate to Gulf Power. The complication derives from the fact that the numerical savings figures identified by Gulf Power for the measures identified in the late-filed exhibit and subsequently utilized by the Commission in establishing Gulf's residential goals reflect the "Technical Potential" for energy and demand savings and not the "Achievable Potential."[1] Gulf Power was careful to note this distinction in preparing the exhibit. The exhibit contains the following disclaimer:

> Achievable Potential estimates were not developed for these measures. Therefore, the only values available are for Technical Potential. The Technical Potential values reflect the upper bound of potential from a technical feasibility sense, regardless of cost of [sic] acceptability to customers. These values do not reflect what is achievable in a utility-sponsored program.

(emphasis supplied).

5. The distinction between Technical and Achievable Potential was addressed in testimony during the evidentiary hearing. As explained by Itron Witness Rufo, Technical Potential is "a theoretical construct that represents the upper bound of energy efficiency potential

[1] Gulf Power did not provide Achievable Potential figures for the Two-Year Payback Measures because such figures were not available. Because they had a customer payback period of two years or less, these measures were excluded from Itron's analysis before Itron developed Achievable Potential figures for Gulf Power. In order to provide Achievable Potential for these measures, Itron would have had to conduct a considerable amount of additional analysis; an exercise which was not feasible given the then-existing timing and resource constraints.

from a technical feasibility sense, regardless of cost, acceptability to customers or normal replacement rates of equipment." [Tr. 881] Technical Potential "does not reflect --and is not intended to reflect-- the amount of energy efficiency potential that is achievable through voluntary, utility programs and should not be evaluated as such." [Id.] The stark difference between Technical and Achievable Potential is borne out in Itron's calculation of Technical and Achievable Potential for energy efficiency measures. Itron calculated the Technical Potential for energy savings for Gulf Power's energy efficiency measures excluding the two year payback measures removed during the screening process to be 2,061 GWh. See, Itron's Response to NRDC/SACE's First Interrogatories (No. 2). [Hearing Exhibit # 117] Itron further calculated the Achievable Potential of these energy efficiency measures in the E-TRC portfolio to be 252 GWh. See, Order No. PSC-09-0855-FOF-EG at p. 20. This Achievable Potential represents a mere 12.2% of the applicable Technical Potential and illustrates the significant distinction between Technical and Achievable Potential. This difference is in part attributable to the "real world constraints such as product availability, contractor/vendor capacity, cost-effectiveness and customer preferences" discussed in the Itron Technical Potential Report for Gulf Power. See, Technical Potential for Electric Energy and Peak Demand Savings for Gulf Power: Final Report at page 3-3.

In essence, the Technical Potential of energy savings for a measure assumes 100 percent adoption. For example, in order for Gulf Power to achieve the Technical Potential of energy savings associated with residential CFL light bulbs, every household in Gulf Power's service area would have to replace every non-CFL bulb in their home with CFL bulbs. Based on the results of the Technical Potential study, there are nearly 4,000,000 bulbs among Gulf's 374,000 residential customers that would have to be replaced in order to achieve this Technical Potential.

As explained by Gulf Witness Floyd, achieving 100 percent adoption for any measure "is not feasible even by giving away the measures to every single customer." [Tr. 1882] Stated another way, achieving 100 percent adoption for any measure is not likely to happen short of a governmental mandate.

6. In summary, because the savings figures associated with the Two-Year Payback Measures reflect Technical Potential, the portion of Gulf Power's residential conservation goals attributable to the Two-Year Payback Measures are of a different context than the portion of the numeric goals associated with the E-TRC Achievable Potential.

7. For the foregoing reasons, Gulf Power requests that the Commission modify its previous Order. Specifically, Gulf Power requests that the Commission adopt the revised residential[2] goals reflected on Exhibit "B" to this motion. Since no Achievable Potential was determined for the Two Year Payback Measures included in Gulf's goals, Gulf has calculated revised goals by utilizing the ratio between the Technical Potential and Achievable Potential developed by Itron for Gulf's E-TRC portfolio measures. As discussed in paragraph five above, this ratio results in an adjustment of the Achievable Potential for the Two-Year Payback Measures equivalent to 12.2% of their Technical Potential value.

8. If the Commission is not amenable to providing the foregoing relief, Gulf requests that the Commission bifurcate Gulf's residential goals in the following manner:

Goals for E-TRC portfolio (measures not having a customer payback of two years or less)

Summer (MW) 62.90; Winter (MW) 60.50; and Annual Energy (GWh) 153.9.

Goals for Two-Year Payback Measures

Summer (MW) 56.00; Winter (MW) 40.00; and Annual Energy (GWh) 322.00.

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[2] Gulf is not requesting modifications to the Commission-Approved Commercial/Industrial goals, as these goals do not included any energy/demand savings associated with Two-Year Payback Measures.

Under this approach, Gulf's overall numerical residential goals would remain the same as the goals specified in the Commission's Order, however the proposed bifurcation will draw a necessary distinction between Technical and Achievable Potential for purposes of periodic reporting, program effectiveness and goal performance.

9. Regardless of the relief granted by the Commission, Gulf plans to propose a variety of programs intended to increase the adoption of Two-Year Payback Measures as part of its upcoming DSM Plan. Through these programs, Gulf hopes to obtain additional information concerning the level of energy and demand savings which is reasonably achievable for such measures. Counsel for Gulf Power has attempted to contact counsel for all parties of record in this matter and is authorized to report that Progress Energy Florida, Florida Power & Light, Tampa Electric Company, and Florida Public Utilities Company take no position on this motion. As of the date of this filing, the undersigned was not able to determine the positions of the remainder of the parties to this docket.

Respectfully submitted this 14th day of January, 2010.

/s/ Steven R. Griffin
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EXHIBIT "A"

Top 10 Two-year Payback Measures- Overall

Top 10 by Annual Energy

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential*		
				Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Residential	1	CFL (18-Watt integral ballast), 2.5 hr/day	87.3	4.6	6.5
Energy Efficiency	Residential	1	CFL (18-Watt integral ballast), 6.0 hr/day	47.4	2.5	3.5
Energy Efficiency	Residential	1	Electronically Commutated Motors (ECM) on an Air Handler Unit	41.7	13.2	25.1
Energy Efficiency	Residential	1	High Efficiency One Speed Pool Pump (1.5 hp)	36.1	7.7	1.5
Energy Efficiency	Residential	1	Two Speed Pool Pump (1.5 hp)	35.2	7.5	1.5
Energy Efficiency	Commercial	1	CFL Screw-in 18W	33.9	6.7	4.3
Energy Efficiency	Commercial	1	Premium T8, Elecctronic Ballast	31.4	6.2	4.0
Energy Efficiency	Residential	2	CFL (18-Watt integral ballast), 2.5 hr/day	29.3	1.5	2.2
Energy Efficiency	Residential	1	AC Maintenance (Outdoor Coil Cleaning)	23.4	9.0	0.0
Energy Efficiency	Residential	1	Proper Refrigerant Charging and Air Flow	23.2	8.9	0.0

Top 10 by Summer Peak Demand

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential*		
				Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Residential	1	Electronically Commutated Motors (ECM) on an Air Handler Unit	41.7	13.2	25.1
Energy Efficiency	Residential	1	AC Maintenance (Outdoor Coil Cleaning)	23.4	9.0	0.0
Energy Efficiency	Residential	1	Proper Refrigerant Charging and Air Flow	23.2	8.9	0.0
Energy Efficiency	Residential	1	AC Maintenance (Outdoor Coil Cleaning)	21.9	8.5	0.0
Energy Efficiency	Residential	1	High Efficiency One Speed Pool Pump (1.5 hp)	36.1	7.7	1.5
Energy Efficiency	Residential	1	Two Speed Pool Pump (1.5 hp)	35.2	7.5	1.5
Energy Efficiency	Residential	2	Default Window With Sunscreen	9.1	6.8	-0.9
Energy Efficiency	Commercial	1	CFL Screw-in 18W	33.9	6.7	4.3
Energy Efficiency	Commercial	1	Premium T8, Elecctronic Ballast	31.4	6.2	4.0
Energy Efficiency	Commercial	3	CFL Screw-in 18W	21.3	4.8	1.7

Top 10 by Winter Peak Demand

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential*		
				Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Residential	1	Electronically Commutated Motors (ECM) on an Air Handler Unit	41.7	13.2	25.1
Energy Efficiency	Residential	1	CFL (18-Watt integral ballast), 2.5 hr/day	87.3	4.6	6.5
Energy Efficiency	Residential	1	Heat Trap	21.6	1.6	4.8
Energy Efficiency	Residential	1	Water Heater Blanket	20.0	1.5	4.4
Energy Efficiency	Commercial	1	CFL Screw-in 18W	33.9	6.7	4.3
Energy Efficiency	Commercial	1	Premium T8, Elecctronic Ballast	31.4	6.2	4.0
Energy Efficiency	Residential	1	CFL (18-Watt integral ballast), 6.0 hr/day	47.4	2.5	3.5
Energy Efficiency	Residential	1	Low Flow Showerhead	14.7	1.1	3.2
Energy Efficiency	Commercial	1	PC Network Power Management Enabling	18.3	1.5	3.0
Energy Efficiency	Residential	2	Electronically Commutated Motors (ECM) on an Air Handler Unit	4.8	1.6	2.6

* Achievable Potential estimates were not developed for these measures. Therefore, the only values available are for Technical Potential. The Technical Potential values reflect the upper bound of potential from a technical feasibilty sense, regardless of cost of acceptability to customers. These values do not reflect what is achievable in a utility-sponsored program.

Top 10 Two-year Payback Measures- Residential

Top 10 by Annual Energy

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential* Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Residential	1	CFL (18-Watt integral ballast), 2.5 hr/day	87.3	4.6	6.5
Energy Efficiency	Residential	1	CFL (18-Watt integral ballast), 6.0 hr/day	47.4	2.5	3.5
Energy Efficiency	Residential	1	Electronically Commutated Motors (ECM) on an Air Handler Unit	41.7	13.2	25.1
Energy Efficiency	Residential	1	High Efficiency One Speed Pool Pump (1.5 hp)	36.1	7.7	1.5
Energy Efficiency	Residential	1	Two Speed Pool Pump (1.5 hp)	35.2	7.5	1.5
Energy Efficiency	Residential	2	CFL (18-Watt integral ballast), 2.5 hr/day	29.3	1.5	2.2
Energy Efficiency	Residential	1	AC Maintenance (Outdoor Coil Cleaning)	23.4	9.0	0.0
Energy Efficiency	Residential	1	Proper Refrigerant Charging and Air Flow	23.2	8.9	0.0
Energy Efficiency	Residential	1	AC Maintenance (Outdoor Coil Cleaning)	21.9	8.5	0.0
Energy Efficiency	Residential	1	Heat Trap	21.6	1.6	4.8

Top 10 by Summer Peak Demand

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential* Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Residential	1	Electronically Commutated Motors (ECM) on an Air Handler Unit	41.7	13.2	25.1
Energy Efficiency	Residential	1	AC Maintenance (Outdoor Coil Cleaning)	23.4	9.0	0.0
Energy Efficiency	Residential	1	Proper Refrigerant Charging and Air Flow	23.2	8.9	0.0
Energy Efficiency	Residential	1	AC Maintenance (Outdoor Coil Cleaning)	21.9	8.5	0.0
Energy Efficiency	Residential	1	High Efficiency One Speed Pool Pump (1.5 hp)	36.1	7.7	1.5
Energy Efficiency	Residential	1	Two Speed Pool Pump (1.5 hp)	35.2	7.5	1.5
Energy Efficiency	Residential	2	Default Window With Sunscreen	9.1	6.8	-0.9
Energy Efficiency	Residential	1	CFL (18-Watt integral ballast), 2.5 hr/day	87.3	4.6	6.5
Energy Efficiency	Residential	1	HVAC Proper Sizing	3.2	4.2	0.0
Energy Efficiency	Residential	1	AC Maintenance (Outdoor Coil Cleaning)	10.7	4.1	0.0

Top 10 by Winter Peak Demand

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential* Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Residential	1	Electronically Commutated Motors (ECM) on an Air Handler Unit	41.7	13.2	25.1
Energy Efficiency	Residential	1	CFL (18-Watt integral ballast), 2.5 hr/day	87.3	4.6	6.5
Energy Efficiency	Residential	1	Heat Trap	21.6	1.6	4.8
Energy Efficiency	Residential	1	Water Heater Blanket	20.0	1.5	4.4
Energy Efficiency	Residential	1	CFL (18-Watt integral ballast), 6.0 hr/day	47.4	2.5	3.5
Energy Efficiency	Residential	1	Low Flow Showerhead	14.7	1.1	3.2
Energy Efficiency	Residential	2	Electronically Commutated Motors (ECM) on an Air Handler Unit	4.8	1.6	2.6
Energy Efficiency	Residential	2	CFL (18-Watt integral ballast), 2.5 hr/day	29.3	1.5	2.2
Energy Efficiency	Residential	1	Faucet Aerators	8.0	0.6	1.8
Energy Efficiency	Residential	1	High Efficiency One Speed Pool Pump (1.5 hp)	36.1	7.7	1.5

* Achievable Potential estimates were not developed for these measures. Therefore, the only values available are for Technical Potential. The Technical Potential values reflect the upper bound of potential from a technical feasibility sense, regardless of cost of acceptability to customers. These values do not reflect what is achievable in a utility-sponsored program.

Top 10 Two-year Payback Measures- Commercial

Top 10 by Annual Energy

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential* Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Commercial	1	CFL Screw-in 18W	33.9	6.7	4.3
Energy Efficiency	Commercial	1	Premium T8, Elecctronic Ballast	31.4	6.2	4.0
Energy Efficiency	Commercial	3	CFL Screw-in 18W	21.3	4.8	1.7
Energy Efficiency	Commercial	2	CFL Screw-in 18W	19.4	3.9	1.7
Energy Efficiency	Commercial	1	PC Network Power Management Enabling	18.3	1.5	3.0
Energy Efficiency	Commercial	1	Premium T8, EB, Reflector	17.5	3.5	2.2
Energy Efficiency	Commercial	11	PSMH, 250W, magnetic ballast	12.9	2.3	1.0
Energy Efficiency	Commercial	1	ROB Premium T8, EB, Reflector	12.5	2.5	1.6
Energy Efficiency	Commercial	10	CFL Screw-in 18W	12.3	2.0	1.4
Energy Efficiency	Commercial	1	CFL Hardwired, Modular 18W	11.3	2.2	1.4

Top 10 by Summer Peak Demand

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential* Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Commercial	1	CFL Screw-in 18W	33.9	6.7	4.3
Energy Efficiency	Commercial	1	Premium T8, Elecctronic Ballast	31.4	6.2	4.0
Energy Efficiency	Commercial	3	CFL Screw-in 18W	21.3	4.8	1.7
Energy Efficiency	Commercial	2	CFL Screw-in 18W	19.4	3.9	1.7
Energy Efficiency	Commercial	1	Premium T8, EB, Reflector	17.5	3.5	2.2
Energy Efficiency	Commercial	1	Thermal Energy Storage (TES)	-0.7	2.8	0.0
Energy Efficiency	Commercial	2	Ceiling Insulation	4.6	2.7	0.6
Energy Efficiency	Commercial	1	Aerosole Duct Sealing	11.2	2.5	0.0
Energy Efficiency	Commercial	1	ROB Premium T8, EB, Reflector	12.5	2.5	1.6
Energy Efficiency	Commercial	11	PSMH, 250W, magnetic ballast	12.9	2.3	1.0

Top 10 by Winter Peak Demand

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential* Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Commercial	1	CFL Screw-in 18W	33.9	6.7	4.3
Energy Efficiency	Commercial	1	Premium T8, Elecctronic Ballast	31.4	6.2	4.0
Energy Efficiency	Commercial	1	PC Network Power Management Enabling	18.3	1.5	3.0
Energy Efficiency	Commercial	1	Premium T8, EB, Reflector	17.5	3.5	2.2
Energy Efficiency	Commercial	3	CFL Screw-in 18W	21.3	4.8	1.7
Energy Efficiency	Commercial	2	CFL Screw-in 18W	19.4	3.9	1.7
Energy Efficiency	Commercial	5	Premium T8, Elecctronic Ballast	8.2	1.1	1.6
Energy Efficiency	Commercial	1	PC Manual Power Management Enabling	9.8	0.8	1.6
Energy Efficiency	Commercial	1	ROB Premium T8, EB, Reflector	12.5	2.5	1.6
Energy Efficiency	Commercial	1	Printer Power Management Enabling	8.9	0.7	1.4

* Achievable Potential estimates were not developed for these measures. Therefore, the only values available are for Technical Potential. The Technical Potential values reflect the upper bound of potential from a technical feasibilty sense, regardless of cost of acceptability to customers. These values do not reflect what is achievable in a utility-sponsored program.

Top 10 Two-year Payback Measures- Industrial

Top 10 by Annual Energy

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential* Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Industrial	4	Pumps - Controls	10.0	0.9	1.3
Energy Efficiency	Industrial	6	Pumps - Controls	10.0	0.8	0.9
Energy Efficiency	Industrial	4	Pumps - O&M	3.4	0.3	0.5
Energy Efficiency	Industrial	6	Pumps - O&M	3.4	0.3	0.3
Energy Efficiency	Industrial	4	Pumps - Sizing	3.2	0.3	0.4
Energy Efficiency	Industrial	6	Pumps - Sizing	3.2	0.3	0.3
Energy Efficiency	Industrial	4	Pumps - ASD (100+ hp)	2.3	0.0	0.3
Energy Efficiency	Industrial	6	Pumps - ASD (100+ hp)	2.3	0.0	0.2
Energy Efficiency	Industrial	6	Premium T8, Elecctronic Ballast	2.1	0.2	0.2
Energy Efficiency	Industrial	4	Premium T8, Elecctronic Ballast	2.0	0.2	0.3

Top 10 by Summer Peak Demand

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential* Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Industrial	4	Pumps - Controls	10.0	0.9	1.3
Energy Efficiency	Industrial	6	Pumps - Controls	10.0	0.8	0.9
Energy Efficiency	Industrial	4	Pumps - O&M	3.4	0.3	0.5
Energy Efficiency	Industrial	4	Pumps - Sizing	3.2	0.3	0.4
Energy Efficiency	Industrial	12	Premium T8, Elecctronic Ballast	1.5	0.3	0.2
Energy Efficiency	Industrial	6	Pumps - O&M	3.4	0.3	0.3
Energy Efficiency	Industrial	6	Pumps - Sizing	3.2	0.3	0.3
Energy Efficiency	Industrial	12	Compressed Air-O&M	1.2	0.2	0.2
Energy Efficiency	Industrial	4	Premium T8, Elecctronic Ballast	2.0	0.2	0.3
Energy Efficiency	Industrial	6	Premium T8, Elecctronic Ballast	2.1	0.2	0.2

Top 10 by Winter Peak Demand

Measure Type	Customer Type	Building Type	Measure Name	Technical Potential* Annual Energy GWH	Summer System Peak MW	Winter System Peak MW
Energy Efficiency	Industrial	4	Pumps - Controls	10.0	0.9	1.3
Energy Efficiency	Industrial	6	Pumps - Controls	10.0	0.8	0.9
Energy Efficiency	Industrial	4	Pumps - O&M	3.4	0.3	0.5
Energy Efficiency	Industrial	4	Pumps - Sizing	3.2	0.3	0.4
Energy Efficiency	Industrial	4	Pumps - ASD (100+ hp)	2.3	0.0	0.3
Energy Efficiency	Industrial	6	Pumps - O&M	3.4	0.3	0.3
Energy Efficiency	Industrial	6	Pumps - Sizing	3.2	0.3	0.3
Energy Efficiency	Industrial	4	Premium T8, Elecctronic Ballast	2.0	0.2	0.3
Energy Efficiency	Industrial	3	Air conveying systems	1.2	0.0	0.2
Energy Efficiency	Industrial	4	Pumps - ASD (6-100 hp)	1.7	0.0	0.2

* Achievable Potential estimates were not developed for these measures. Therefore, the only values available are for Technical Potential. The Technical Potential values reflect the upper bound of potential from a technical feasibility sense, regardless of cost of acceptability to customers. These values do not reflect what is achievable in a utility-sponsored program.

EXHIBIT "B"

Revised Conservation Goals for Gulf Power

	Residential								
	Summer (MW)			Winter (MW)			Annual (GWh)		
Year	E-TRC	Residential <2-Yr. Payback	Revised Goal	E-TRC	Residential <2-Yr. Payback	Revised Goal	E-TRC	Residential <2-Yr. Payback	Revised Goal
2010	1.9	0.3	2.2	1.9	0.2	2.1	2.8	0.7	3.5
2011	2.7	0.4	3.1	2.5	0.3	2.8	5.4	1.4	6.8
2012	3.8	0.5	4.3	3.4	0.4	3.8	8.4	2.1	10.5
2013	4.9	0.7	5.6	4.5	0.6	5.1	11.6	3.0	14.6
2014	6.1	0.8	6.9	5.5	0.7	6.2	14.6	3.7	18.3
2015	7.2	1.0	8.2	6.9	0.9	7.8	18	4.6	22.6
2016	8.4	1.1	9.5	8.1	1.0	9.1	21.4	5.5	26.9
2017	9.1	1.2	10.3	8.7	1.1	9.8	23.2	5.9	29.1
2018	9.3	1.2	10.5	9.3	1.2	10.5	24	6.1	30.1
2019	9.5	1.3	10.8	9.7	1.2	10.9	24.5	6.3	30.8
Total	62.9	8.4	71.3	60.5	7.6	68.1	153.9	39.3	193.2