

ORIGINAL

Matilda Sanders

From: Richzambo@aol.com
Sent: Friday, June 25, 2004 11:41 AM
To: Fillings@psc.state.fl.us
Subject: Docket No. 040031-EG -- Petition for approval of conservation goals by PEF

Attached for filing in the referenced docket please find the **Comments of The Florida Industrial Cogeneration Association**.

If you have any questions regarding this filing, or require anything further, please do not hesitate to contact this office.

Thank you.

Rich Zambo

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6/25/2004

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FPSC-COMMISSION OF PUBLIC SERVICE

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ORIGINAL

REGISTERED PROFESSIONAL ENGINEER
REGISTERED PATENT ATTORNEY

COGENERATION & ALTERNATIVE ENERGY
ENERGY REGULATORY LAW

June 25, 2004

Via electronic filing

Ms. Blanca S. Bayó, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

Re: FPSC Docket No. 040031-EG
Petition for approval of conservation goals by Progress Energy Florida, Inc.

Dear Ms. Bayó:

Attached hereto for electronic filing in the referenced proceeding find the Comments of the Florida Industrial Cogeneration Association (FICA), along with a certificate of service.

If you have any questions or require additional information, please contact this office.

Sincerely,

/s/ Richard A. Zambo

RAZ/nb

Richard A. Zambo
Florida Bar No. 312525

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of)
Numeric Conservation Goals)
By Progress Energy Florida)

Docket No. 040031-EG

By electronic filing: June 25, 2004

**COMMENTS
OF
FLORIDA INDUSTRIAL COGENERATION ASSOCIATION**

The Florida Industrial Cogeneration Association (FICA) by and through its undersigned attorney, hereby files these Comments in the captioned proceeding, and states:

- 1 The name, address, and telephone number of the Petitioners are as follows:

Florida Industrial Cogeneration Association
c/o Richard A. Zambo, P.A.
1334 S.E. MacArthur Boulevard
Stuart, Florida 34996
Phone: (772) 225-5400
FAX: (772) 232-0205

2. Copies of all correspondence, pleadings, and other documents should be provided to:

Richard A. Zambo
Richard A. Zambo, P.A.
1334 S.E. MacArthur Boulevard
Stuart, Florida 34996
Phone: (772) 225-5400
FAX: (772) 232-0205

3. The Florida Industrial Cogeneration Association (FICA) is a trade association representing Florida industrial cogenerators. FICA members generate electricity via energy-efficient qualifying cogeneration facilities, and have implemented other means of increasing the efficiency of use of electricity and thermal energy. FICA members have spent, and continue to expend, substantial dollars and resources on such "in-house" conservation activities.

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FPSC-COMMISSION CLERK

4. FICA is concerned with the following aspects of Progress Energy Florida, Inc.'s (PEFI) filings in this proceeding - aspects which FICA believes warrant careful scrutiny by the Commission and significant modification or supplementation by PEFI.

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- PEFI's filing does not acknowledge the very real and substantial contributions of FICA members within its service territory to the overall reduction in electrical demand, electricity consumption, and conservation of fossil fuels. FICA suggests that such independent conservation measures be acknowledged by payments to participating customers in amounts commensurate with resulting benefits to non-industrial consumers.
- PEFI's proposed goals do not reflect, nor do the proposed programs include, industrial conservation and/or efficiency measures of the scale that may be available from Florida's large industries. FICA suggests that PEFI propose a program allowing large consumers, relying on their unique knowledge of their energy characteristics, to propose conservation/efficiency measures that would be funded by the utility.
- PEFI's proposed conservation programs will result in significant conservation cost recovery payments by FICA's members that may be more efficiently spent by industry in the implementation of conservation/efficiency measures unique to each industrial operation. FICA suggests that large industrial consumers with a demonstrated history of implementing significant cogeneration or other efficiency or energy conservation measures be exempted from any conservation cost recovery or similar surcharge.

WHEREFORE, FICA respectfully submits these comments and requests that they be given due consideration by the Commission in this matter.

RESPECTFULLY submitted on the 25th day of June, 2004.

/s/ Richard A. Zambo

Richard A. Zambo
Florida Bar No. 312525

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Attorney for:

Florida Industrial Cogeneration Association

CERTIFICATE OF SERVICE

Docket No. 040031-EG

I HEREBY CERTIFY that a true and correct copy of the foregoing Comments of the Florida Industrial Cogeneration Association has been duly submitted to the U.S. Postal Service on this 25th day of June, 2004 for delivery to the following persons:

Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100

Executive Office of the Governor
Office of Planning and Budget
General Government Unit
The Capitol, Rm. 1502
Tallahassee, FL 32399-0001

Florida Industrial Power Users Group
c/o McWhirter Law Firm
John W. McWhirter
400 North Tampa Street, Suite 2450
Tampa, FL 33602

Adrienne Vining, Esquire
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Bonnie Davis, Esquire
Progress Energy Florida, Inc.
106 East College Avenue, Suite 800
Tallahassee, FL 32301-7740

James McGee, Esquire
Progress Energy Florida, Inc.
P.O. Box 14042
St. Petersburg, FL 33733-4042

/s/ Richard A. Zambo

Richard A. Zambo
Florida Bar No. 312525