## State of Florida



## Aublic Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

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

DATE:

November 25, 2014

TO:

Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk

FROM:

Thomas E. Ballinger, Director, Division of Engineering

RE:

Document to be placed in docket file

Please place the attached table which was referenced at today's Commission conference into the docket file for Docket No. 130199-EI, Commission review of numeric conservation goals (Florida Power & Light Company). If you have any questions, please contact me.

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Numeric Goals (Issues 1-9)		
Option	Pros	Cons
Staff recommendation (RIM with 2 year payback)	<ul> <li>Benefits participants and non-participants.</li> <li>Minimizes rate impact to all customers.</li> <li>Encourages conservation.</li> <li>Consistent with least cost planning and past PSC decisions.</li> </ul>	Reduced energy efficiency savings when compared to other cost- effectiveness tests.
TRC	<ul> <li>Record evidence from utilities available to establish goals.</li> <li>Cost effective from a system basis.</li> </ul>	<ul> <li>Results in non-participants (i.e. low income, renters, etc.) subsidizing others.</li> <li>Average rates increase compared to RIM goals.</li> </ul>
1% of retail sales goals	If achievable, results in large energy savings.	<ul> <li>Results in non-participants (i.e. low income, renters, etc.) subsidizing others.</li> <li>Incomplete data and non-conformance with rules and statute.</li> <li>No cost-effectiveness evidence provided.</li> <li>Rate impacts are large.</li> </ul>
Use RIM with a 1 year payback screen for free riders	<ul> <li>Same as staff rec above.</li> <li>More measures available for rebates/incentives.</li> </ul>	<ul> <li>Record evidence would have to be interpolated to reach goals.</li> <li>Increase subsidy to free riders.</li> <li>Variation from Commission practice of 2-year payback.</li> </ul>
Continue with existing programs	<ul> <li>Programs have history of savings.</li> <li>Customer familiarity.</li> </ul>	<ul> <li>Record evidence obtained for comparative purposes, not for goal setting purposes.</li> <li>Many programs would need to be revised to account for appliance efficiency standards and costeffectiveness.</li> </ul>
Continue with existing (2009) goals for 2015-2019	Established goals by prior Order.	<ul> <li>Not based on current planning assumptions.</li> <li>Many programs would need to be revised to account for appliance efficiency standards and costeffectiveness.</li> <li>Utilities likely to not meet goals.</li> </ul>