

Christopher Cooney

From: Betty Leland
Sent: Wednesday, July 22, 2015 2:12 PM
To: Commissioner Correspondence
Subject: #140226-EI - Letter from Richard A McAllister, Florida Retail Federation
Attachments: Richard A McAllister Letter .pdf

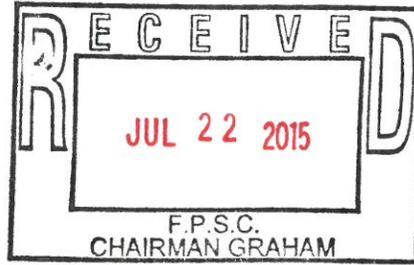
Good Afternoon:

Please place the attached letter in docket correspondence consumers and their representatives in Docket No. 140226.

Thanks.



July 22, 2015



Chairman Art Graham
Commissioner Lisa Polak Edgar
Commissioner Ronald A. Brisé
Commissioner Julie Imanuel Brown
Commissioner Jimmy Patronis
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Energy Efficiency Opt-Out Proposals, PSC Docket No. 140226-EI

Dear Chairman Graham and Commissioners:

On behalf of the Florida Retail Federation, I write to you in support of the proposals presented in Docket No. 140226-EI to allow commercial and industrial customers to “opt out” of paying the energy efficiency portion of the utilities’ Energy Conservation surcharges, so long as such customers implement, at their own expense, energy efficiency measures that provide energy conservation benefits to the State that are proportionately greater than or equal to the utilities’ conservation goals. The Retail Federation strongly supports energy conservation efforts because they improve the overall efficiency of the Florida economy while keeping more money in Floridians’ pockets, which in turn supports Florida jobs.

As I understand the “opt out” proposals, the underlying concept is that customers know their operations better than their utilities, which is only natural, and that by paying for their energy efficiency measures with their own funds, i.e., at no direct cost to the utilities’ customers, they will improve the energy conservation performance of Florida as a whole. I further understand that the opt-out proposals would only allow for participating customers to opt out of that portion of the utilities’ conservation programs that are directed at energy efficiency, and that the participating customers would remain as participants paying for demand response, or demand reduction, programs.

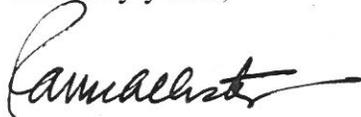
I further understand that the pending proposals offer additional protections to the utilities’ other customers in that they would require opt-out customers to certify to their serving utilities that they have implemented energy efficiency measures that have reduced the customer’s usage by a percentage at least as great as the utility’s overall energy efficiency reductions, or that they have performed an energy audit and committed to implement the recommended measures. I further understand that the proposals would require that, to be

eligible, a customer could not have taken benefits under the utility's energy efficiency programs during the preceding 2 years, and that, once having "opted out," the customer could not opt back in to the utility's programs for 2 years.

We believe that this type of creative incentive structure should be beneficial for all Floridians, because it will give larger customers – who are willing to expend their own funds to achieve energy savings at least as great as the utility's energy savings percentage – meaningful incentives to invest wisely and efficiently in energy conservation measures, with no direct costs to other customers. Accordingly, we urge you to approve these proposals.

If you have any questions, please call me at (850) 222-4082.

Sincerely yours,

A handwritten signature in black ink, appearing to read "R. McAllister", with a long horizontal flourish extending to the right.

Richard A. McAllister
President/CEO

cc: Carlotta Stauffer, Commission Clerk
Parties on Attached Service List

SERVICE LIST FOR JULY 22, 2015 LETTER – DOCKET NO. 140226-EI

Lee Eng Tan
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
ltan@psc.state.fl.us

Jeffrey A. Stone/Russell A. Badders
Steven R. Griffin
Beggs & Lane
Post Office Box 12950
Pensacola, FL 32591-2950
jas@beggslane.com /rab@beggslane.com
srg@beggslane.com

Robert L. McGee, Jr.
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0780
rlmcgee@southernco.com
lroddy@southernco.com

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street
Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

James Beasley / J. Wahlen
Ashley Daniels
Ausley Law Firm
P.O. Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
adaniels@ausley.com

Cheryl Martin
Florida Public Utilities Company Regulatory Affairs
1641 Worthington Road
Suite 220
West Palm Beach, FL 33409-6703
cheryl_martin@fpuc.com

Jon C. Moyle, Jr./Karen Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Kenneth Hoffman
Florida Power & Light Company 215 South Monroe
Street
Suite 810
Tallahassee, FL 32301-1858
Ken.hoffman@fpl.com

Matthew Bernier
Cameron L. Cooper
106 East College Avenue Suite 800
Tallahassee, FL 32301
matthew.bernier@duke-energy.com

John T. Burnett/Dianne M. Triplett Duke Energy
Post Office Box 14042
St. Petersburg, FL 33733
John.burnett@duke-energy.com
Dianne.triplett@duke-energy.com

Jessica Cano
Florida Power & Light Company 700 Universe
Blvd.
Juno Beach, FL 33408
Jessica.Cano@fpl.com

Robert Scheffel Wright
John T. LaVia, III
Gardner Law Firm
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com