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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Adoption of Numeric Conservation Goals for:
Florida Power & Light Company,
Florida Power Corporation,
Gulf Power Company; and
Tampa Electric Company

Docket No. 971004-EG RECORDS AND
Docket No. 971005-EG REPORTING
Docket No. 971006-EG
Docket No. 971007-EG

Filed: March 8, 1999


LEAF'S PRELIMINARY ISSUE STATEMENT

Pursuant to the Prehearing Order in this case, the Legal Environmental Assistance Foundation, ("LEAF") files the following preliminary issue statement. LEAF reserves the right to supplement or modify these issues.

1. What energy and demand savings measures merit cost effectiveness testing?
2. What analytical method should the Commission use to estimate DSM cost effectiveness?
3. What resource costs or benefits should the Commission use to estimate DSM cost effectiveness?
4. Is the analytical method the Company used to estimate cost effectiveness appropriate?
5. Are the resource costs and benefits assumptions used in the Company's DSM cost effectiveness estimations appropriate?
6. Have the amount of cost effective savings been understated because the Company's assumptions underestimate the supply-side costs which DSM avoids?

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 JEC 1 _____
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7. Should the environmental and health costs and benefits of energy resource alternatives be included as the Commission compares the costs and benefits of demand vs. supply-side resources?
8. If a company's cost effectiveness claims are based on inappropriate assumptions or derived via inappropriate methods how will the Commission secure appropriate cost effectiveness information?
9. If a saving measures that merits cost effectiveness testing has not been tested, how will the Commission become informed about the cost effectiveness of that measure?
10. What are the rate, bill, generation expansion, and revenue requirement effects of TRC passing DSM?
11. What should the Commission do to further encourage TRC-passing DSM that offers large bill savings and low rate impacts?

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12. Are any TRC passing measures part of the total cost effective savings potential referred to in Rule 25-17.0021, FAC?

13. What data and analyses are most appropriate for use by the Commission in identifying, pursuant to Rule 25-17.0021(1), FAC, the total cost effective savings reasonably achievable in the Company's service area over the goal setting period?

14. Is the Company's projection, pursuant to Rule 25-17.0021(3), FAC, of the savings reasonably achievable through DSM appropriate?

15. Is the method and data used to develop the Company's projection, pursuant to Rule 25-17.0021(3), FAC, of the savings reasonably achievable through DSM appropriate?

16. What are the total cost effective demand and energy savings reasonably achievable in the Company's service area over the goal setting period?

17. What annual energy (KWH) savings goals should be set for the Company?

18. What annual summer and winter demand (KW) saving goals should be set for the Company?

19. Is statutory charge to increase the efficiency of energy consumption via goals designed to reduce the growth rates of electric consumption being met appropriately?

20. Do current conservation efforts by Florida's electric utilities focus unduly on load management?

21. Is the company appropriately providing DSM to its low income customers?

22. Is the Company appropriately promoting solar energy?

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of LEAF's Preliminary Issue Statement were sent by U.S. mail this 8th day of March, 1999 to:

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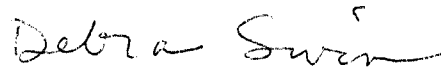
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