

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Adoption of Numeric Conservation Goals and Consideration of National Energy Policy Act Standards (Section 111) by FLORIDA POWER AND LIGHT COMPANY.) DOCKET NO. 930548-EG
In Re: Adoption of Numeric Conservation Goals and Consideration of National Energy Policy Act Standards (Section 111) by FLORIDA POWER CORPORATION.) DOCKET NO. 930549-EG
In Re: Adoption of Numeric Conservation Goals and Consideration of National Energy Policy Act Standards (Section 111) by GULF POWER COMPANY.) DOCKET NO. 930550-EG
In Re: Adoption of Numeric Conservation Goals and Consideration of National Energy Policy Act Standards (Section 111) by TAMPA ELECTRIC COMPANY.) DOCKET NO. 930551-EG
ORDER NO. PSC-95-0075-FOF-EG
ISSUED: January 12, 1995

The following Commissioners participated in the disposition of this matter:

SUSAN F. CLARK, Chairman
J. TERRY DEASON
JULIA L. JOHNSON
DIANE K. KIESLING

ORDER GRANTING IN PART AND DENYING IN PART RECONSIDERATION

Docket Nos. 930548-EG, 930550-EG, 930550-EG, and 930551-EG were opened to implement Rules 25-17.001-.005, Florida Administrative Code. These rules require the setting of numeric demand side management (DSM) goals for electric utilities subject to the Florida Energy Efficiency and Conservation Act (FEECA), 366.80-366.85 and 403.519, Florida Statutes. In this proceeding we also considered implementation of two standards set forth in the Public Utilities Regulatory Policy Act of 1978 (PURPA) as amended

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by Subtitle B, Section 111, of the Energy Policy Act of 1992 (EPACT). These standards are commonly referred to as the "Integrated Resource Planning" and the "Income Neutrality" standards.

The Prehearing Order for this proceeding was issued on May 26, 1994 (Order No. PSC-94-0652-PHO-EG). The hearing was held on: June 1-4, 6-10, 17-18, 20-21, 27, 29-30, and July 12, 1994. These dates included service hearings that were held in the evenings for the public in Tallahassee on June 1, in Miami on June 30, and in Tampa on July 12, 1994. Briefs and Posthearing Statements were filed on August 22, 1994. A special agenda conference to decide the issues was held on October 3, 1994.

On October 25, 1994, we issued Order No. PSC-94-1313-FOF-EG, setting conservation goals for Florida's four major investor-owned electric utilities. On November 9, 1994, the Legal Environmental Assistance Foundation, Inc., and Deborah B. Evans (collectively referred to hereinafter as LEAF), filed a motion for reconsideration of the Commission's order, and a request for oral argument. On November 9, 1994, the Florida Department of Community Affairs (DCA) filed an Adoption of LEAF's Motion for Reconsideration and a request for oral argument.

Responses to LEAF's motion for reconsideration were filed by Florida Power and Light Company and Tampa Electric Company. On November 21, 1994, Gulf Power Company (Gulf) filed a Motion for Enlargement of Time to respond to LEAF's motion which was denied, but which, to the extent it responds to the merits of LEAF's motion, will be treated as Gulf's response.

We will first address the requests for oral argument filed by LEAF and DCA. Rule 25-22.058, Florida Administrative Code, provides that the Commission has the discretion to grant oral argument upon request of any party to a section 120.57 formal hearing. The rule requires that the party's request for oral argument must state with particularity why oral argument would aid the Commission in comprehending and evaluating the issues before it.

LEAF and DCA have not attempted to demonstrate that the Commission would benefit from oral argument. DCA in its request has given no reason for its request, and no explanation of how oral argument would assist the Commission. LEAF has stated only that oral argument would aid the Commission, and that in fairness, LEAF should be given the same opportunity as staff to present oral argument. Neither DCA nor LEAF has complied with the requirement of Rule 25-22.058 that the request state with particularity why

oral argument would aid the Commission in comprehending and evaluating the issues. The requests for oral argument are therefore denied.

LEAF, in its 44 page Motion for Reconsideration, asserts that the Commission erred in the following respects:

1. In failing to directly rely on data found in the utilities' cost-effectiveness goals results reports (CEGRRs);
2. In making factual errors in comparison of cost-effective achievable potential;
3. In the use of the word "negligible" to describe the difference between RIM and TRC based goals;
4. In rejecting the SRC Best Practices benchmark;
5. In setting pass-fail goals instead of aspirational goals;
6. In interpreting the term "cost-effectiveness" inconsistently with the conservation goals rule;
7. In placing dashes instead of numbers in Gulf's commercial/industrial goals.

We will separately address each of the points made by LEAF.

1. THE COMMISSION CORRECTLY RELIED ON DATA FOUND IN THE UTILITIES' CEGRRS

LEAF relied on data filed in the utilities cost-effectiveness goals results reports (CEGRRs) to prepare a series of tables changing the demand and energy input values from those set forth in the Executive Summary Tables of the staff recommendation. LEAF argues that the demand and energy numbers in the utilities' CEGRRs should be used without modification. In adopting appropriate conservation goals for Florida's investor-owned utilities, we determined that the data in the CEGRRs should not be lifted verbatim, but should be considered in conjunction with testimony given at the hearing. We chose to use the CEGRRs as a data base because they contain utility specific data. Certain adjustments,

fully supported by the record in this docket, were necessary to place the data in the correct context. LEAF has shown no error of fact or law to support reconsideration on this ground.

2. CERTAIN ERRORS IN DATA SHOULD BE CORRECTED; NONE AFFECT THE GOALS SET IN ORDER NO. PSC-94-1313-FOF-EG

In its Motion, LEAF questions how the percent of system numbers were calculated, and alleges errors in the data that was presented by staff at the Special Agenda Conference. We have found minor errors (as discussed below) but none would have affected the goals we set in this docket.

- A. CALCULATION OF PERCENT OF SYSTEM - Staff used projected demand and energy data from Exhibits 13, 39, 46, and 59 in the calculation. These values were then added to utility proposed goal values to get the value of the system absent any DSM. In other words, the Summer DSM goal (Residential and Commercial combined) was added to the utility projected summer peak demand. This is because the demand reported in the Ten Year Site Plan is net of the utility's DSM efforts. The proposed goal was then divided by this adjusted number to arrive at the percent of system number. LEAF has shown no error in the methodology used to calculate percent of system.
- B. GULF DATA - LEAF correctly points out that an error exists in Gulf's summer demand percent of system values. The error is in the system total, not in the MW (megawatt) amount of projected DSM, and raises the summer demand percent of system values from a range of .1 to .3 percentage points.
- C. FPL DATA - LEAF alleges that staff made mistakes pertaining to FPL's RIM and TRC figures identified on pages 50-51 of Order No. PSC-94-1313-FOF-EQ. It appears that staff made two mistakes when compiling the Residential Utility Calculated Goals Based on TRC Table used in the executive summary. Additionally, the energy savings for FPL's Residential Goals Based on TRC was reported incorrectly, as staff used an FPL table containing computational errors. However, no mistakes were made in setting goals. The TRC residential summer MW and winter MW were reported as 770 and 629 respectively. The corrected numbers should be 882 and 668 respectively. (Exhibit 16, Document 3 pages 21, 22). Staff did not add the new incremental installations from

year 2003 to the 2003 existing totals as identified in FPL's summary tables attached to Mr. Hugues' direct testimony. To calculate the residential TRC energy savings, staff used FPL's Residential Energy Table which contained computational errors within the spreadsheet. Staff originally reported 6,319 GWH (gigawatt hour) for residential TRC energy savings. The corrected number is 1,603 GWH.

See the attached tables for these corrections. The portions of the tables highlighted in gray indicate corrected data.

- D. TECO DATA - It appears that on page 11 of LEAF's motion LEAF has relied on an exhibit originally attached to Mr. Currier's direct testimony that was never admitted into the record. On April 25, 1994, TECO served on all parties corrected exhibits to Mr. Currier's direct testimony, which ultimately were admitted into the record as exhibit 64. The Commission relied on Exhibit 64 (JEC-1) Document No. 1 and No. 2 for TECO's "Utility Proposed RIM Goals Discounted for Free Riders", "Commission Approved 100% RIM Goals", and "Utility Calculated Goals Based on TRC" data on page 50 and 51 of the order. Therefore, no correction to this data is necessary.
- E. LEAF'S SAVINGS DIFFERENCES TABLES - LEAF's table entitled "Savings Differences Between RIM and TRC Portfolios" on page 13 of its motion contains several incorrectly transcribed numbers and also contains "corrected" data lifted verbatim from the utilities' CEGRRs, which we do not believe is appropriate. Therefore, we do not accept LEAF's table entitled "Savings Differences Between RIM and TRC Portfolios". It is clear that LEAF has not demonstrated error of fact or law in our exercise of discretion setting RIM-based goals in order to keep rates lower for all customers.

We therefore grant LEAF's Motion for Reconsideration insofar as our compilations of data for Gulf and FPL shall be corrected as set forth in paragraphs B and C above. These corrections do not affect the goals we have set in this docket, and apart from these corrections, LEAF has shown no ground for reconsideration that would materially affect the outcome of the case.

3. THE COMMISSION'S USE OF THE WORD "NEGLIGIBLE" TO DESCRIBE THE DIFFERENCE BETWEEN RIM AND TRC BASED GOALS WAS NOT ERROR

On pages 12-15, paragraphs 11-14, of its motion, LEAF provides data purporting to support its contention that we erred in finding the difference in energy and demand savings between TRC and RIM portfolios to be negligible. LEAF demonstrates this "mistake" by providing two tables (pp. 13, 14) showing the differences between the utilities' TRC and RIM portfolios first based on data from pages 50-51 of the Final Order, and then based on "corrected" data provided by LEAF on pages 10-11 of its motion.

As previously discussed, LEAF's tables showing the savings differences between TRC and RIM on pages 13 and 14 contain several mathematical errors. Despite this fact, the "substantial" versus "negligible" savings question cannot be answered solely through a comparison of TRC to RIM MW and MWH (megawatt hour) savings. Differences in MW and MWH savings may be substantial in isolation, but negligible when viewed from a rates, generation expansion, and revenue requirements perspective. In this docket, when we compared the MW and MWH savings in each RIM and TRC portfolio and the differences between the two, to each utility's system peak demand and energy sales, the savings are negligible. The use of the word "negligible" is the result of an overall cost-effectiveness evaluation, and not just consideration of one piece, such as MW or MWH savings. A complete and balanced view was provided in the staff recommendation and at the Special Agenda. We made an informed decision after comparing the higher rate impacts of the TRC portfolio to the RIM portfolio. Apart from the corrections previously addressed, LEAF has shown no appropriate ground for reconsideration.

4. THE COMMISSION CORRECTLY CONSIDERED THE SRC BEST PRACTICES SCENARIO

On pages 28-33, paragraphs 40 through 52 of its motion, LEAF contends that the Commission rejected SRC's Best Practices scenario based on factual errors. LEAF's argument is without merit. We will address each of the contentions made by LEAF.

Contrary to LEAF's assertion in paragraph 40 of its motion, staff's reference to SRC's Best Practices goals lacking utility specific planning information is supported by the record. Tr. 4297, 2722-24. LEAF misunderstands or misconstrues DCA's expert witness Mr. McDonald's testimony on the use of SRC Best Practices scenario. Witness McDonald testified that the Commission should use the SRC best practices scenarios contained in Exhibit 90 as a

benchmark if it decides to set aspirational goals. Mr. McDonald agreed that utility specific data and analysis should be used if the Commission is to set goals for which utilities will be held accountable. Tr. 2722-24

Contrary to LEAF's assertion in paragraph 43, the executive summary was not designed to include comparisons of each parties' proposed goals. This comparison was made in the body of the staff recommendation. The executive summary did include the "Best Practices" values in order to present the range of MW and GWH savings from the various scenarios. We did not vote from this summary, but utilized it for informational purposes prior to voting on individual goal issues.

Contrary to LEAF's assertion in paragraph 44, we did consider the SRC Best Practices scenario, but did not place a great deal of reliance on this scenario in setting goals, as stated on page 18 of our final order.

In paragraph 45, LEAF alleges that the finding in the Final Order on page 33 is mistaken in its conclusion that the SRC study would not establish meaningful numeric goals due to its lack of utility-specific planning information. LEAF is correct in its representation that the SRC study contains data and avoided costs estimates based on planning information obtained from the various participants to the study. However, the SRC study lacks current utility specific planning information. The SRC study contained data that was approximately one to two years old, while the utilities' analyses in these dockets contained the most recent utility specific planning data at the time of hearing.

Mr. McDonald testified that the results from the SRC study cannot be blindly applied to all investor-owned utilities, because SRC did not have utility service area specific data, and did not have current avoided costs for the utilities. Tr. 2721-22 Mr. McDonald also agreed that a study that used assumptions specific to that utility's service territory would contain a more accurate estimate of the cost-effective achievable potential than would be contained in a more generalized study, like the SRC study. Tr. 2722-23.

In paragraph 46, LEAF takes exception with the Final Order at page 33 which states that the Best Practices scenario contains some very optimistic assumptions. LEAF acknowledges that this statement accurately reflects the specific citations given, but does not believe that this statement is a fair or balanced characterization of the Best Practices Scenario. Mr. McDonald testified that the SRC study contained both optimistic as well as conservative

assumptions. Tr. 2644, 2647 LEAF states that the SRC study also had many conservative assumptions and should be used as a benchmark for establishing goals. Ultimately, we correctly relied upon the methodology/process of each utility when establishing goals. Mr. McDonald's testimony supports this reliance where he agreed that the Commission should base FPL's goal on FPL's plans rather than the SRC study. Tr. 2727

As LEAF alleges in paragraph 47, Mr. McDonald did testify about the reasonableness of using the Best Practices scenario as a benchmark for setting goals. However, in Mr. McDonald's testimony he acknowledged that a lot has changed in the year since the SRC study was done. Tr. 2672 Mr. McDonald only favored using the SRC study results as a basis for setting aspirational goals. Tr. 2673. Mr. McDonald also testified that he would adopt a different philosophy if he were subject to penalties or risks of penalties if the goals were not met. Tr. 2673

Contrary to LEAF's assertion in paragraph 48, we considered the SRC Best Practices scenario, but set achievable goals that incorporated the utilities' individual planning process and analysis. In setting goals we did not place a great deal of reliance on SRC's Best Practices scenario. We chose to set pass/fail goals. Mr. McDonald agreed that use of utility specific analyses is appropriate in setting pass/fail as opposed to aspirational goals. Tr. 2675-2676

In paragraph 49, LEAF attempts to make a distinction between Mr. McDonald's supposed general preference identified in paragraph 49 to his understandable preference in paragraph 50. We find it impossible to make such a distinction from reading the record.

In paragraph 50, LEAF attempts to describe Mr. McDonald's responses as an understandable preference for the use of the more specific utility CEGRR information to set goals, which did not diminish his preference to use the SRC Best Practices data as a benchmark in setting goals. The record does not support LEAF's interpretation. Mr. McDonald identified two types of goals. Tr. 2673 Mr. McDonald stated that he preferred to use the SRC Best Practices study results as a benchmark for aspirational type goals, but he would adopt a different philosophy if he were subject to a penalty or risk of penalty for not meeting the goals. Tr. 2672-73 In these dockets, we have set goals that the utilities are expected

to achieve. Utilities that do not meet their goals will face the possibility of a penalty, or have programs prescribed to them in a manner to be determined by the Commission on a case-by-case basis.

In paragraph 51, LEAF states that Mr. McDonald advocated the use of the SRC Best Practices data in benchmarking the utility's filings for setting goals. This statement is partly correct. As previously discussed Mr. McDonald differentiated between two types of goals. We have previously discussed Mr. McDonald's position at length as it relates to both aspirational goals for benchmarking purposes and to his testimony that utility specific data would result in a more accurate estimate of the cost-effectiveness potential and meaningful achievable numeric goals. We did not reject the SRC best practices scenario as a result of factual errors. Reconsideration will not be granted on this ground.

5. THE COMMISSION DID NOT VIOLATE ITS RULES IN SETTING PASS/FAIL GOALS

In its Motion for Reconsideration, LEAF asserts that setting pass/fail goals, and placing utilities subject to penalty should they fail, is contrary to Rule 25-17001(6), Florida Administrative Code, which requires the "best efforts" of the utilities to achieve their goals, and which recognizes that in planning for future capacity there is no absolute assurance that these goals will be achieved, and that estimates on which goals are based may prove to be incorrect.

LEAF's contention is without merit. The setting of pass/fail goals is in furtherance of, and not contrary to, the rule language.

The rule language promotes reliability by preventing reliance on DSM projections until it is shown that energy and capacity savings have actually been achieved. It requires cautious planning, so that shortages of capacity and energy are avoided during future peaks.

The "best efforts" language encourages utilities to achieve DSM goals. It does not prohibit the imposition of a penalty should goals not be achieved. At the same time, the rule recognizes that in planning Florida's energy future, DSM savings should not be counted before they are actually achieved.

The setting of pass/fail conservation goals furthers the rule's purpose of promoting reliability in the planning process. By subjecting utilities to the possibility of a penalty or Commission prescribed programs should they fail to achieve their

goals, the Commission is increasing the likelihood that goals will be achieved. In turn, the likelihood that DSM efforts will truly avoid and defer generating capacity is increased.

Pursuant to Rule 25-17.001(6), Florida Administrative Code, we will not count Florida's DSM savings until they are achieved. Pursuant to Order No. PSC-94-1313-FOF-EG, we have tried to create the most favorable conditions for achieving DSM savings in energy and capacity. The rule and the Commission's order exist in harmony to promote reliability and a favorable DSM experience in Florida. We have made no error of fact or law. No ground for reconsideration exists.

6. THE COMMISSION'S INTERPRETATION OF "COST-EFFECTIVE" WAS NOT ERRONEOUS

LEAF asserts that the Commission erred in making Cost effectiveness determinations based on the RIM and participant tests. LEAF argues that since FEECA is to be liberally construed and since Rule 25-17.001(7), Florida Administrative Code, refers to lowering energy costs, we erred in considering rate impacts, rather than bill impacts.

We disagree. While both FEECA and the conservation goals rule envision cost-effective goals, "cost-effective" is not a defined term. We purposefully chose not to define "cost-effective" in adopting the conservation goals rule, retaining flexibility in the application of the rule. Our rule on conservation cost-effectiveness, Rule 25-17.008, gives us flexibility by mandating analyses under three methodologies and allowing other cost-effectiveness analyses without a stated preference for any approach.

LEAF's argument that Rule 25-17.001(7), Florida Administrative Code, uses the term "cost" in a fashion that mandates the use of the TRC test to the exclusion of the Participants and RIM tests in setting goals is at odds with the flexibility given under FEECA and preserved in our conservation goals and conservation cost-effectiveness rules. LEAF construes the term "cost" as meaning "bills" when the more plausible contextual interpretation is that "cost" means "rates". There has been no Commission failure to consider bill impact. We have chosen to keep rates lower for all

customers, lowering bills for nonparticipants and participants. LEAF has not established legal error in our use of the RIM and Participant tests in establishing conservation goals.

7. THE USE OF DASHES FOR SOME OF GULF'S COMMERCIAL/INDUSTRIAL ENERGY GOALS WAS NOT ERROR

The record in this docket reflected that no cost-effective energy savings could be achieved by Gulf Power in the commercial/industrial sector for certain years. This is in part due to the small number of customers in Gulf's commercial/industrial rate classes, as well as the fact that a significant number of these customers cogenerate their own electricity.

Once again, LEAF argues against the use of the RIM test and in favor of TRC or the SRC best practices scenario. According to LEAF, the fact that Gulf's commercial/industrial classes will have no goals for certain years, demonstrates the absurdity of using the RIM test.

As previously discussed, both FEECA and the conservation goals rule envision cost-effective goals. Where our analysis indicates no cost-effective energy savings for Gulf in the commercial/industrial sector for certain years, our order correctly reflects this result. No error exists. LEAF's argument that we should set a goal when the record reflects that it will not be cost-effective is without merit.

Based on the foregoing, it is

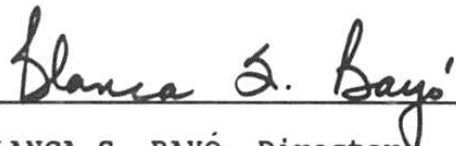
ORDERED by the Florida Public Service Commission that the requests for Oral Argument made by the Legal Environmental Assistance Foundation, Inc., Deborah B. Evans, and the Florida Department of Community Affairs are hereby denied. It is further

ORDERED that the Motion for Reconsideration filed by the Legal Environmental Assistance Foundation, Inc. and Deborah B. Evans, on November 9, 1994, and adopted by the Florida Department of Community Affairs on November 9, 1994, is hereby granted to the extent that numeric errors contained in Order No. PSC-94-1313-FOF-EG in the compilation of data for Gulf Power Company and Florida Power and Light Company are hereby corrected as set forth in the body of this order. It is further

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ORDERED that the Motion for Reconsideration filed by the Legal Environmental Assistance Foundation, Inc. and Deborah B. Evans, on November 9, 1994, and adopted by the Florida Department of Community Affairs on November 9, 1994, is hereby denied in all other respects.

By ORDER of the Florida Public Service Commission, this 12th day of January, 1995.



BLANCA S. BAYÓ, Director
Division of Records and Reporting

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MAP

NOTICE OF JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.59(4), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by the Commission's final action in this matter may request judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water or wastewater utility by filing a notice of appeal with the Director, Division of Records and Reporting, 101 East Gaines Street, Tallahassee, Florida 32399-0870, and filing a copy of the notice of appeal and the

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filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

Revised 12/6/94

COMPARISON OF RESIDENTIAL GOALS IN 2003								
	UTILITY PROPOSED RIM GOALS DISCOUNTED FOR FREE RIDERS							
	FPL		FPC		TECO		GULF	
	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS
Summer	631	3.7	174	1.8	76	2.4	88	3.9
Winter	542	3.1	444	4.8	267	7.5	96	4.6
GWH	684	.7	136	.3	128	.7	38	0.4
	STAFF PROPOSED 100% RIM GOALS							
	FPL		FPC		TECO		GULF	
	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS
Summer	895	5.2	209	2.6	93	2.9	126	5.6
Winter	765	4.4	483	5.2	292	8.2	137	6.6
GWH	1,030	1.0	184	.4	172	.9	54	0.5
	UTILITY CALCULATED GOALS BASED ON TRC							
	FPL		FPC		TECO		GULF	
	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS
Summer	882	5.2	319	4.0	106	3.4	139	6.1
Winter	668	3.8	743	8.0	309	8.7	143	6.8
GWH	1,603	1.6	1323	3.1	490	2.7	87	0.8
	SRC "BEST PRACTICES" GOALS							
	FPL		FPC		TECO		GULF	
	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS
Summer	2,084	12.2	65	.8	193	6.1	54	2.4
Winter	836	4.8	93	1.0	72	2.1	25	1.2
GWH	4,873	4.9	449	1.0	373	2.1	212	2.0

Note: 1 GWH = 1,000,000 KWH

1 MW = 1,000 KW

Building code effects excluded from above.

Revised 12/6/94

COMPARISON OF COMMERCIAL/INDUSTRIAL GOALS IN 2003								
	UTILITY PROPOSED RIM GOALS DISCOUNTED FOR FREE RIDERS							
	FPL		FPC		TECO		GULF	
	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS
Summer	420	2.5	68	.8	18	.6	15	0.7
Winter	179	1.0	54	.6	6	.2	8	0.4
GWH	562	.6	239	.6	79	.4	6	0.06
	STAFF PROPOSED 100% RIM GOALS							
	FPL		FPC		TECO		GULF	
	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS
Summer	622	2.6	84	1.1	59	1.9	22	1.0
Winter	245	1.4	64	.7	21	.6	11	0.5
GWH	832	.8	336	.8	267	1.4	8	0.08
	UTILITY CALCULATED GOALS BASED ON TRC							
	FPL		FPC		TECO		GULF	
	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS
Summer	853	5.0	347	4.4	97	3.1	76	3.4
Winter	254	1.4	250	2.7	31	.9	53	2.5
GWH	1,339	1.4	671	1.6	436	2.4	128	1.2
	SRC "BEST PRACTICES" GOALS							
	FPL		FPC		TECO		GULF	
	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS	MW/GWH	% OF SYS
Summer	1,059	6.2	178	2.2	181	5.7	77	3.4
Winter	232	1.3	60	.6	43	1.2	25	1.2
GWH	3,081	3.1	732	1.7	523	2.8	255	2.4

Note: 1 GWH = 1,000,000 KWH

1 MW = 1,000 KW

Building code effects excluded from above.