



The Independent Savings Plan Company

ORIGINAL FILE COPY

June 30, 1995

VIA HAND DELIVERY

Blanca Bayo, Director
Division of Records and Reporting
Public Service Commission
2540 Shurmard Oak Blvd.
Tallahassee, Florida 32399-0850

RE: Joint Petition on Proposed Agency Action in
Docket Nos. 941170-EG, 941171-EG, 941172-EG, 941173-EG

Dear Ms. Bayo:

Enclosed for filing are a Joint Petition on Proposed Agency
Action by The Independent Savings Plan Company and Solar City,
Inc. Also enclosed are 15 copies of the Petition.

Please stamp the copy of this letter to serve as a receipt
for the applications.

If you have any questions, please feel free to call me.

Sincerely,

Robert B. Hicks (signature)

Enclosures

- ACK ✓
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2. SOLAR's address is:

Solar City, Inc.
4305 West Alva Street
Tampa, Florida 33614

3. Correspondence concerning this petition should be sent to:

Robert B. Hicks, Esquire
6302 Benjamin Road, Suite 414
Tampa, Florida 33634

4. Petitioners became aware of the Proposed Agency Action embodied in Order No. PSC-95-0691-FOF-EG on May 23, 1995, and obtained a copy of the Order on June 13, 1995.

5. ISPC is a privately-owned Florida corporation which finances the retail sales of solar water heating products for Florida consumers. Since its inception in 1983, ISPC's sales and financing activities at the retail level have been centered in geographic areas in which Florida Power & Light Company ("FP&L") solar water heating program incentives have been available. ISPC, either directly (when ISPC was a direct retail seller of solar systems), or indirectly (through its authorized contractor/merchant network which now receives the incentive payments and which business network utilizes ISPC financing) is acknowledged to be the largest single "redeemer" of FP&L's solar incentive payments. ISPC also finances sales of solar water heating products in areas served by Florida Power Corporation ("FPC"), Gulf Power Company ("Gulf") and Tampa Electric Company ("TECO"). The proposed termination of

FP&L's residential solar water heating program and the failure of FPC, Gulf, and TECO to establish a viable solar water heating program will negatively impact the solar industry in Florida. Therefore, ISPC's substantial interests will be affected by the decisions contained in the PAA Order.

6. SOLAR is a privately-owned Florida corporation which distributes (at the wholesale level) solar water heating equipment throughout Florida and has offices and stores in Tampa, Altamonte Springs, Venice and Hollywood. SOLAR also owns 100% of the stock of ISPC. SOLAR is generally regarded as the largest wholesale distributor in the southeastern United States, and supplies at least 75% of all solar collectors sold in Florida for solar water heating systems (and for which FP&L incentives have been available). A large number of licensed plumbing, solar specialty, and other contractors are SOLAR wholesale customers, and retail sales from the wholesale purchases occur throughout Florida, including all territories served by FP&L, FPC, Gulf, and TECO. The proposed termination of FP&L's residential solar water heating program and the failure of FPC, Gulf and TECO to establish a viable solar water heating program will negatively impact the solar industry in Florida. Therefore, SOLAR's substantial interests will be affected by the decisions contained in the PAA Order.

7. Petitioners are also customers of investor-owned electric utilities. As such, Petitioners have an interest in the promotion and encouragement of solar water heating, both by the PSC and the electric utilities. Solar water heating is the most widely used

water heating program will have a negative effect on the solar industry?

14. Whether the failure of TECO, Gulf and FPC to establish a residential solar water heating program will have a negative effect on the solar industry?

ULTIMATE FACTS ALLEGED

15. FP&L's existing residential solar water heating program meets the criteria set forth in Order No. 22176 and in the Goals Order and should be continued.

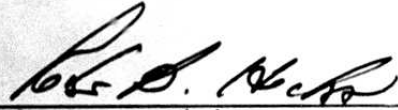
16. Residential solar water heating programs can be developed by FP&L, TECO, Gulf and FPC which meet the criteria set forth in Order No. 22176 and in the PAA Order and should be implemented.

RULES AND STATUTES

17. Sections 366.81 and 366.82, Florida Statutes, and Rules 25-17.001, 25-17.0021 and 25-17.008, Florida Administrative Code, entitle Petitioners to relief.

Based on the foregoing, Petitioners request that a hearing be held pursuant to Section 120.57, Florida Statutes, to determine whether the Demand-Side Management Plans of FP&L, FPC, Gulf and TECO are consistent with the Goals Order, the provisions of Sections 366.81 and 366.82, Florida Statutes, and Rules 25-17.0021 and 25-17.008, Florida Administrative Code, and whether the Demand-Side Management Plans meet the criteria set forth in Order 22176 and in the PAA Order.

Respectfully submitted,



Robert B. Hicks
6302 Benjamin Road, Suite 414
Tampa, Florida 33634
ATTORNEY FOR THE
INDEPENDENT SAVINGS PLAN
COMPANY AND SOLAR CITY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Joint Petition on Proposed Agency Action has been furnished by U.S. Mail this 30th day of June, 1995 to the following:

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