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## **Jacksonville Electric Authority**

233 WEST DUVAL STREET . P. O. BOX 53015 . JACKSONVILLE, FLORIDA 32201

August 21, 1989

Mr. Steve C. Tribble, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, Florida 32301

Re: Docket No. 890737-PU

Mr. Tribble:

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PPSC-BUREAU OF RECORDS

Enclosed for filing are the original and fifteen copies of Jacksonville Electric Authority's Comments on Staff's workshop of June 7,1989 in the above docket.

By copy of this letter, this document has been furnished to the parties on the attached service list.

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# Jacksonville Electric Authority

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233 WEST DUVAL STREET . P O BOX 53015 . JACKSONVILLE FLORIDA 32201

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Implementation of Section 366.80-.85, ) Docket No. FS, Conservation Activities of ) 890737-PU Electric and Gas Utilities )

#### JACKSONVILLE ELECTRIC AUTHORITY'S COMMENTS ON STAFF'S WORKSHOP

At its June 7, 1989 workshop, the Commission Staff asked the parties to this Docket to provide proposed methodologies for adopting conservation goals. The Jacksonville Electric Authority offers the following comments:

- Conservation and other demand-side programs should be evaluated along with supply-side options in each utility's planning process.
- 2) Conservation goals should be cost effective on an individual utility basis since it is the ratepayers of the individual utility who must bear the cost.
- 3) Conservation goals should be process oriented instead of results oriented, i.e., require effort instead of kW or kWh results.

Conservation programs require the willing participation of individual customers. By consistently reducing its rates during the FEECA goals decade, the JEA sent price signals that overwhelmed its successful conservation programs. Conservation goals must not require a utility to thwart its customers' individual economic decisions.

4) The existing rule should continue to be used into 1990 so that the Commission can take the time necessary to develop a workable new rule.

#### CERTIFICATE OF SE VICE

I hereby certify that a true and correct copy of the foregoing has been served by U.S. Mail this 21st day of August, 1989, to the following:

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