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May 11, 1995

Susan F. Clark, Chairman
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida

BY HAND DELIVERY

RE: The Commission's May 16 Agenda Conference Vote on Demand Side Management Plans for Florida's Investor-Owned Utilities, Docket Nos. 94117-EG through 941173-EG

Dear Chairman Clark:

So that the Commission may reasonably oversee conservation goals compliance, and assure conservation goals are met in the most prudent and cost-effective way for Florida's ratepayers, LEAF's April 17, 1995 letter urged staff to recommend the Commission take three actions in the above referenced dockets:

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC _____
- WAS _____
- OTH _____

* **direct each utility to file and follow a monitoring and evaluation plan** designed to cost-effectively gather information necessary to enforce Commission-set conservation goals.

* **make clear that goals cannot be met with savings from "free riders"** and require that achievements be reported both gross and net of free riders along with all assumptions and evaluation data regarding free-ridership; and

* **provide for meaningful annual review** of goals compliance.

Though silent on the two latter suggestions, Staff's May 4, 1995 recommendation does find that each utility's "proposed methodology for measuring actual kW and kWh savings achieved for each program is much too general" and recommends that each utility "file a more detailed methodology within six months of the order approving the programs."

Attachment 1 states LEAF's specific recommendations for Commission action. The following states the rationale for LEAF's recommendations.

DOCUMENT NUMBER - DATE

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FPSC-RECORDS/REPORTING