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March 14, 1996

IN REPLY REFER TO:

Tallahassee

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Energy Audits - Rule Amendments  
Docket No. 960023-EG

Dear Ms. Bayo:

Enclosed for filing are the original and fifteen (15) copies of Tampa Electric's Comments in the above-referenced docket.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

ACK  Thank you for your assistance in this matter.

AFA \_\_\_\_\_

APP 1

CAF \_\_\_\_\_

CMU \_\_\_\_\_

CTR \_\_\_\_\_

EAG Haff JDB/bjm

LEG \_\_\_\_\_

LIN 5 Enclosures

OPC \_\_\_\_\_ cc: Michael Haff (w/enclosure)

RCH 1

SEC 1

WAS \_\_\_\_\_

OTH \_\_\_\_\_

Sincerely,

  
James D. Beasley

RECEIVED  
  
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03123 MAR 14 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Amendments to Rule )  
25-17.003, F.A.C., Energy Audits, )  
and Proposed Repeal of Rules )  
25-17.051, F.A.C., Definitions as )  
Used in this Part; 25-17.052, )  
F.A.C., Auditors, Minimum )  
Qualifications; 25-17.053, F.A.C., )  
Program Announcement; 25-17.054, )  
F.A.C., Energy Audit; Offer and )  
Initial Contact; 25-17.0545, F.A.C.)  
Contracts for Performing Audits; )  
25-17.055, F.A.C., Performance of )  
the Energy Conservation Audit; )  
25-17.055, F.A.C., The Five-Star )  
Rating System; 25-17.056, F.A.C., )  
Program Inspections; 25-17.057, )  
F.A.C., Energy Conservation Audit )  
Results; 25-17.059, F.A.C., Energy )  
Conservation Audit Charges, )  
Disclosures, and Disclaimers; )  
25-17.061, F.A.C., Financing and )  
Installation Arrangements; )  
25-17.064, F.A.C., Program Work )  
Plans and Reports; and 25-17.065, )  
F.A.C., Program Recordkeeping )

DOCKET NO. 960023-EG

FILED: March 14, 1996

COMMENTS OF TAMPA ELECTRIC COMPANY

Pursuant to the Notice of Rulemaking issued in the above docket on February 15, 1996 in Order No. PSC-96-0219-NOR-EG, Tampa Electric submits the following written comments on the rule language amendments contained in such order:

1. On page 8 of the order the definition of "commercial audit" appears in the midst of a number of provisions pertaining solely to residential audits. For clarity, Tampa Electric would recommend that the definition of "commercial audit" be moved from page 8, lines 3-6 to page 10 beginning after the existing line 2, with all affected subsections of this section being relettered to

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

reflect the relocation of this definition. With the above change, all subsections of the rule pertaining to residential audits would appear together in the rule followed by references to commercial audits and industrial audits.

2. On page 10 of Order No. PSC-96-0219-NOR-EG, line 7 refers to mail in audits, saying that they mean "an energy analysis of a residence . . ." Tampa Electric would propose adding the words "or building" after the word "residence" on page 10, line 7 of the order. This would acknowledge the fact that the company performs mail in audits for both residential and commercial customers. The rule language presently contained in the order suggests that only residential mail in audits are performed.

3. On page 18 of Order No. PSC-96-0219-NOR-EG, at section (13), the draft rule would require every utility to keep certain information regarding a customer's energy usage for twelve months prior and twelve months after the date of an audit. The last sentence of this section states that the record shall list the amount of electricity and natural gas purchased for each month of both twelve month periods. Tampa Electric proposes changing the word "and" to "or" in that sentence to be consistent with the notion that electric utilities should retain information regarding the electricity they sell and natural gas utilities should be responsible for retaining records on the gas they sell to the individual natural gas customer. Electric utilities do not have access to the monthly record of natural gas sales to individual customers nor do the natural gas utilities have access to data

regarding the monthly amount of electricity the electric utilities sell to their individual customers.

4. Tampa Electric submits that the foregoing minor adjustments to draft rule language contained in the February 15, 1996 Notice of Rulemaking will improve the nature and effect of the proposed rule.

DATED this 14<sup>th</sup> day of March, 1996.

Respectfully submitted,



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