

FLORIDA PUBLIC SERVICE COMMISSION
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Tallahassee, Florida 32399-0850

MEMORANDUM

August 28, 1997

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TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)

FROM: DIVISION OF ELECTRIC & GAS (HAFF) *MSA RB*
DIVISION OF LEGAL SERVICES (KEATING) *WCK RVE* *RJ* *JD*

RE: DOCKET NO. 970595-EG, PETITION FOR AUTHORITY TO IMPLEMENT
GOOD CENTS ENERGY LOAN PROGRAM BY GULF POWER COMPANY

AGENDA: 9/09/97 - REGULAR AGENDA - PROPOSED AGENCY ACTION -
INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: S:\PSC\EAG\WP\970595.RCM

ATTACHMENT NOT PART OF THE ELECTRONICALLY TRANSMITTED VERSION.

CASE BACKGROUND

The Florida Energy Efficiency and Conservation Act (FEECA), Sections 366.80 - 366.85, Florida Statutes, requires the Commission to adopt goals to reduce and control the growth rates of electric consumption and weather-sensitive peak demand. In Docket No. 930551-EG, the Commission set numeric demand-side management (DSM) goals for Gulf Power Company (Gulf) (Order No. PSC-94-1313-FOF-EG, issued October 25, 1994). Gulf's DSM Plan, designed to meet these goals, was approved by the Commission in Docket No. 941172-EG (Order No. PSC-95-0691-FOF-EI, issued June 9, 1995).

Gulf has an existing Commission-approved loan program known as Gulf Express. This loan has been offered to residential customers so that they could add energy-saving measures and equipment to their homes. Gulf subsidizes the loan by buying down the interest rate. Loan expenses have been recovered by the company through the

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

DOCKET NO. 970595-EG
AUGUST 28, 1997

Energy Conservation Cost Recovery (ECCR) Clause. However, the program is no longer cost-effective; therefore, Gulf has ceased issuing new Gulf Express loans. Gulf plans to keep the Gulf Express Loan Program open only until all outstanding loans have been repaid.

Because it wishes to continue offering reduced-rate loans for customer installation of conservation measures, Gulf has petitioned the Commission for approval of the Good Cents Energy Loan. This new program offers loans of up to \$15,000, with up to a seven-year period for payback, for the installation of up to 18 energy conservation measures. Gulf plans to use a Southern Company subsidiary to provide the loans at lower than market rates. In addition, Gulf will buy down the interest rate by 1%. Gulf's expenses from the proposed loan program would be passed on to ratepayers through the ECCR clause.

While new homes are not eligible for Gulf's proposed loan program, all residential customers with existing homes in Gulf's service territory are eligible to participate. Natural gas heating, in combination with electric air conditioning or heat pumps, is eligible for Gulf's loan program. However, Gulf expects the bulk of its loans to be issued for the following: conversion from natural gas heating to an electric heat pump; conversion from electric strip heating to heat pumps; replacement of an old electric heat pump with a new, more efficient heat pump; geothermal applications; and addition of attic insulation up to R-38.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission approve Gulf Power Company's petition for approval of its new Good Cents Energy Loan Program, including approval for cost recovery through the Energy Conservation Cost Recovery Clause?

RECOMMENDATION: No. Contrary to Rule 25-17.001, Florida Administrative Code, and FEECA, Gulf's proposed loan program: (1) is forecasted to increase winter peak demand and annual energy consumption while only minimally reducing summer peak demand; (2) does not include any end-use metering to verify estimated demand savings; (3) does not pass the Participants' test or the Total Resource Cost (TRC) test and minimally passes the Rate Impact Measure (RIM) test; and (4) encourages the switch from natural gas heating to electric heating.

STAFF ANALYSIS: When the Commission reviews conservation programs, it considers three criteria:

1. Whether the program advances the policy objectives of Rule 25-17.001, Florida Administrative Code, and FEECA;
2. Whether the program is directly monitorable and yields measurable results; and
3. Whether the program is cost-effective.

Staff has four major concerns with Gulf's proposed Good Cents Energy Loan program: (1) it is expected to increase winter peak demand and annual energy usage, but minimally reduce summer peak demand; (2) it does not include any end-use metering to verify estimated demand and energy impacts; (3) it fails to pass the Participants' test (0.28 benefit-cost ratio) and the Total Resource Cost (TRC) test (0.06), and is marginally cost-effective (1.01) under the Rate Impact Measure (RIM) test; and (4) it does not represent energy conservation, but, rather, electricity competing with natural gas.

1. Winter Demand and Annual Energy Increase / Minimal Summer Demand Reduction

Rule 25-17.001(2), Florida Administrative Code, summarizes the Commission's policy on energy conservation:

DOCKET NO. 970595-EG
 AUGUST 28, 1997

The Florida Energy Efficiency and Conservation Act requires increasing the efficiency of the electric systems of Florida, increasing the conservation of expensive resources, such as petroleum fuels, reducing the growth rate of weather sensitive peak demand, and reducing and controlling the growth rate of kilowatt hour consumption to the extent cost effective. (Emphasis added)

Gulf estimates that the proposed Good Cents Loan Program will reduce summer peak demand by a total of 252 kW (0.252 MW), or 0.42 kW per participant. However, the program is expected to increase annual energy consumption by 168,600 kWh (281 kWh per participant) and winter peak demand by a total of 1164 kW (1.164 MW), or 1.94 kW per participant. Gulf attributes these increases to the high saturation of natural gas heating in its service territory.

There are 18 eligible conservation measures in Gulf's Good Cents Energy Loan program; five of these measures are expected to have the highest level of customer participation. The kW demand, kWh energy, and percent participation estimates for these five measures were combined to arrive at the totals for the loan program. This analysis is summarized in the following table:

CONSERVATION MEASURE	PARTICIPATION	PER-PARTICIPANT SAVINGS (WEIGHTED AVERAGE)		
		Winter kW	Summer kW	Annual kWh
gas heat to heat pump	55.0%	-2.42	0.17	-744
heat pump to heat pump	33.0%	0.03	0.10	188
strip heat to heat pump	2.0%	0.09	0.01	94
geothermal	10.0%	0.15	0.08	64
SUBTOTAL - FOUR HEATING MEASURES	100.0%	-2.15	0.36	-398
R-38 attic insulation		0.21	0.07	116
TOTAL FOR ALL FIVE MEASURES		-1.94	0.43	-282

Customers who want to install new natural gas heating in combination with electric air conditioning can obtain a loan under

Gulf's proposed Good Cents Energy Loan program. However, switching from natural gas heating to electric heat pumps is expected. The preceding table shows Gulf's expectation that a majority (55%) of all loans for heating, ventilating, and air conditioning (HVAC) replacements will be the conversion from natural gas heating to electric heat pumps. This conversion is the cause of increased winter demand and annual energy consumption for the overall loan program. Increased demand and energy consumption is clearly contrary to the intent of Rule 25-17.001, Florida Administrative Code, and FEECA. Further, the increased winter demand and annual energy increases from natural gas conversion to electric heat pumps offset any savings from other options eligible under the proposed loan program.

2. Program Monitoring

The forecasted demand and energy savings (or increases) for Gulf's Good Cents Energy Loan program are based on engineering estimates. Gulf proposes to analyze billing data to verify the accuracy of these estimates. Gulf also has historical data on the impact of conservation measures installed under the existing Gulf Express loan program. However, without pre- and post-installation measurement data, staff cannot be sure of the accuracy of Gulf's engineering estimates.

Staff is also concerned with the impact of the newer, high-efficiency heat pumps on Gulf's electric grid. These heat pumps contain a scroll compressor, which is efficient with heating and cooling but which may degrade the power factor of a utility distribution system. If a substantial number of utility customers install the newer heat pumps, the utility may have to take corrective steps, with corresponding costs, to improve the power factor of its distribution system. Because Gulf forecasts only 600 participants in its Good Cents Energy Loan program, Gulf expects that the cumulative impact of new heat pump additions through this program on Gulf's distribution system will be negligible, if noticeable at all. The minimal savings forecasted by Gulf for the loan program may be completely negated by the increased costs caused by low power factor.

3. Cost-effectiveness

Gulf's avoided cost is based on a capacity purchase, scheduled to start in 1999, from the Southern Company. In the past, Gulf has

DOCKET NO. 970595-EG
AUGUST 28, 1997

used avoided capacity purchases in lieu of avoided generating units when analyzing the cost-effectiveness of DSM programs. Because Gulf appears to have reasonably calculated the costs associated with a capacity purchase, staff does not believe that Gulf's choice to use this method is a problem.

The cost-effective analysis of Gulf's proposed Good Cents Loan Program, using the RIM, TRC, and Participants' tests, is attached to this recommendation as Appendix I. Gulf's proposed loan program does not pass the Participants' test (0.28 benefit-cost ratio) or the TRC test (0.06). Staff questions how Gulf expects its residential customers to participate in a loan program that fails to pass the Participants' test. Participant costs consist primarily of the cost to buy energy-efficient equipment with the loan. Participant benefits include Gulf's 1% buy-down of the loan, and any perceived value from equipment purchases made with the loan. Since this perceived value is the primary cause for interest in the program, customers who participate in the program could be considered as free riders. Further, while this perceived value cannot be included in any cost-effectiveness analysis, Gulf apparently expects that customers will pay for this value. Gulf forecasts 300 participants in the program's first year (remainder of 1997) and 600 participants in 1998. No new program participants are forecasted after 1998, since the avoided capacity purchase is due to begin in 1999.

Gulf's proposed loan program minimally passes the RIM test, with a 1.01 benefit-cost ratio. Under RIM, Gulf forecasts that the program will not become cost-effective for 11 years on a nominal basis. On a cumulative present worth basis, the program is not cost-effective until year 30, the last year of the study period. The company's RIM analysis shows that Gulf expects to spend \$3,142,000 over 30 years, on a cumulative present worth basis, to achieve an expected program benefit of only \$35,000 by year 30.

DSM programs that marginally pass the RIM test provide no room for errors in forecasting demand and energy savings, or changes to avoided generation costs. This is clearly the case with Gulf's proposed Good Cents Energy Loan program. With a RIM value of 1.01 and a projected total program benefit of \$35,000 over 30 years, Gulf's program is vulnerable to risks such as forecasting errors or changes to avoided generation costs.

DOCKET NO. 970595-EG
AUGUST 28, 1997

4. Natural Gas Competition

Gulf expects its proposed loan program to increase winter peak demand and annual energy consumption. As mentioned previously, the primary reason for this increase is Gulf's projection that a majority (55%) of loan recipients will convert from natural gas heating to electric heat pumps. In large part, this is not energy conservation but, rather, electricity competing with natural gas. This result violates the Commission's policy on fuel neutrality in conservation programs approved for cost recovery.

In summary, Gulf's proposed Good Cents Energy Loan Program does not meet any of the criteria by which the Commission has approved past conservation programs and their cost recovery through the ECCR clause. Therefore, staff recommends that Gulf's request for authorization to implement the proposed Good Cents Energy Loan program be denied by the Commission.

ISSUE 2: Should this docket be closed?

RECOMMENDATION: Yes.

STAFF ANALYSIS: If no person whose substantial interests are affected by the Commission's proposed agency action files a protest within twenty-one days of the issuance of the order, Docket No. 970595-EG should be closed.

PSC Form CE 1.1
Page 1 of 1
Run Date: 31-Mar-07
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INPUT DATA -- PART 1

Cost-Effectiveness Analysis per Rule 25-17.008 Florida Administrative Code

I. Program Demand Impacts and Line Losses

(1) Change in Peak kW Customer at meter	-0.42	kW/Cus
(2) Change in Peak kW per Customer at generator	-0.54	kW Gen/Cu
(3) kW Line Loss Percentage	12.60%	
(4) Change in kWh per Customer at generator	7.70%	kWh/Cus/Yr
(5) kWh Line Loss Percentage	303	
(6) Group Line Loss Multiplier	1.0034	
(7) Annual Change in Customer kWh at Meter	281	kWh/Cus/Yr
(8) Change in Winter kW per Cust at meter	1.94	kW/Cus

II. Economic Life and K-Factors

(1) DSM Program Study Period	30	Years
(2) Economic Life of Incremental Generation	40	Years
(3) Economic Life of Incremental T&D	30	Years
(4) K-Factor for Generation	1.4436	
(5) K-Factor for T&D	1.4336	
(6) Switch: Rev Reg (0) or Val-of-Def (1)	0	

III. Utility & Customer Costs

(1) Utility Nonrecurring Cost Per Customer	\$172.33	\$/Cus
(2) Utility Recurring Cost Per Customer	\$0.00	\$/Cus/Year
(3) Utility Cost Escalation Rate	2.64%	
(4) Customer Equipment Cost	\$5,000.00	\$/Cus
(5) Customer Equipment Cost Escalation Rate	2.64%	
(6) Customer O&M Cost	(\$175.00)	\$/Cus/Year
(7) Customer O&M Cost Escalation Rate	0.00%	
(8) Customer Tax Credit Per Installation	\$0.00	\$/Cus
(9) Customer Tax Credit Escalation Rate	2.64%	
(10) Change in Supply Costs	\$0.00	\$/Cus/Year
(11) Supply Costs Escalation Rate	2.64%	
(12) Utility Discount Rate	8.77%	
(13) Utility AFUDC Rate	10.03%	
(14) Utility Nonrecurring Rebate/Incentive	\$125.00	\$/Cus
(15) Utility Recurring Rebate/Incentive	\$0.00	\$/Cus/Year
(16) Utility Rebate/Incentive Escalation Rate	2.64%	

IV. Incremental Generation, Transmission, & Distribution Costs

(1) Base Year	1997
(2) In-Service Year For Incremental Generation	1999
(3) In-Service Year For Incremental T & D	1998
(4) Base Year Incremental Generation Cost	\$232.00 \$/kW
(5) Base Year Incremental Transmission Cost	\$58.00 \$/kW
(6) Base Year Incremental Distribution Cost	\$32.00 \$/kW
(7) Gen, Tran, & Dist Cost Escalation Rate	2.14%
(8) Generator Fixed O & M Cost	\$2.78 \$/kW/Yr
(9) Generator Fixed O&M Escalation Rate	2.53%
(10) Transmission Fixed O & M Cost	\$0.73 \$/MW/Yr
(11) Distribution Fixed O & M Cost	\$0.80 \$/MW/Yr
(12) T&D Fixed O&M Escalation Rate	1.25%
(13) Incremental Gen Variable O & M Costs	\$0.570 \$/MW/Yr
(14) Incre Gen Variable O&M Cost Esc Rate	2.57%
(15) Incremental Gen Capacity Factor	3.40%
(16) Incremental Generating Unit Fuel Cost	\$0.0356 \$/MWh
(17) Incremental Gen Unit Fuel Esc Rate	2.90%
(18) Incremental Purchased Capacity Cost	\$21.76 \$/MW/Yr
(19) Incremental Capacity Cost Esc Rate	2.07%

Stop Revenue Loss at In-Service Year? (Y=1, N=0) 0

V.

(1) Non-Fuel Cost in Customer Bill (Base Year)	
(1) Non-Fuel Cost in Customer Bill (Base Year)	\$0.0332 \$/MWh
(2) Non-Fuel Escalation Rate	Per Table
(3) Customer Demand Charge Per kW (Base Year)	\$0.0000 \$/MWh/Mo
(4) Demand Charge Escalation Rate	Per Table
(5) Average Annual Change in Monthly Billing kW	0 kWh/Mo.

Summary Results for This Analysis

	RIM	Participant
NPV Benefits(\$000s)	\$3,177	\$12,815
NPV Costs (\$000s)	\$3,142	\$45,090
NPV Net Benefits (\$000s)	\$35	(\$32,274)
Benefit Cost Ratio	1.011	0.284

* Supplemental Information Not Specifically Specified in Cost Effectiveness Manual

POC Form CE 2.3
Page 1 of 1
Run Date: 31-Jan-07
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Total Resource Cost-Effectiveness Measures
Cost-Effectiveness Analysis per Rule 25-17.008 Florida Administrative Code

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
Year	Change in Electric Supply Costs (\$'000s)	Utility's Program Costs (\$'000s)	Participant's Program Costs (\$'000s)	Other Program Costs (\$'000s)	Other Benefits (\$'000s)	Incremental Generation Cap Costs (\$'000s)	Incremental T&D Cap Costs (\$'000s)	Incremental Prod Fuel Costs (\$'000s)	Total Costs (\$'000s)	Total Benefits (\$'000s)	Total Net Benefits (\$'000s)	Cumulative Discounted Net Benefits (\$'000s)
1997	\$0	\$103	\$2,669	\$0	\$0	(\$19)	(\$13)	\$3	\$3,001	\$10	(\$2,992)	(\$2,992)
1998	\$0	\$108	\$2,858	\$0	\$0	(\$18)	(\$13)	\$3	\$2,981	\$33	(\$2,948)	(\$5,940)
1999	\$0	\$109	\$2,848	\$0	\$0	(\$37)	(\$19)	\$10	\$2,964	\$49	(\$2,915)	(\$8,855)
2000	\$0	\$112	\$2,824	\$0	\$0	(\$40)	(\$20)	\$14	\$2,950	\$65	(\$2,885)	(\$11,740)
2001	\$0	\$115	\$2,805	\$0	\$0	(\$52)	(\$26)	\$18	\$2,938	\$81	(\$2,857)	(\$14,597)
2002	\$0	\$118	\$2,788	\$0	\$0	(\$64)	(\$34)	\$22	\$2,928	\$98	(\$2,830)	(\$17,427)
2003	\$0	\$121	\$2,773	\$0	\$0	(\$77)	(\$38)	\$28	\$2,922	\$115	(\$2,806)	(\$20,233)
2004	\$0	\$124	\$2,761	\$0	\$0	(\$90)	(\$42)	\$34	\$2,919	\$132	(\$2,787)	(\$23,020)
2005	\$0	\$127	\$2,751	\$0	\$0	(\$104)	(\$48)	\$38	\$2,918	\$149	(\$2,767)	(\$25,787)
2006	\$0	\$131	\$2,743	\$0	\$0	(\$118)	(\$55)	\$42	\$2,918	\$166	(\$2,750)	(\$28,537)
2007	\$0	\$134	\$2,738	\$0	\$0	(\$133)	(\$63)	\$48	\$2,919	\$183	(\$2,736)	(\$31,273)
2008	\$0	\$138	\$2,736	\$0	\$0	(\$150)	(\$73)	\$54	\$2,928	\$202	(\$2,726)	(\$33,999)
2009	\$0	\$141	\$2,737	\$0	\$0	(\$167)	(\$83)	\$63	\$2,941	\$220	(\$2,721)	(\$36,720)
2010	\$0	\$145	\$2,740	\$0	\$0	(\$185)	(\$95)	\$72	\$2,958	\$240	(\$2,718)	(\$39,438)
2011	\$0	\$149	\$2,748	\$0	\$0	(\$204)	(\$108)	\$77	\$2,972	\$259	(\$2,713)	(\$42,151)
2012	\$0	\$153	\$2,755	\$0	\$0	(\$223)	(\$123)	\$81	\$2,989	\$278	(\$2,711)	(\$44,862)
2013	\$0	\$157	\$2,768	\$0	\$0	(\$242)	(\$139)	\$83	\$3,005	\$298	(\$2,706)	(\$47,568)
2014	\$0	\$161	\$2,783	\$0	\$0	(\$262)	(\$157)	\$82	\$3,028	\$319	(\$2,709)	(\$50,277)
2015	\$0	\$165	\$2,801	\$0	\$0	(\$284)	(\$178)	\$82	\$3,058	\$342	(\$2,716)	(\$53,000)
2016	\$0	\$170	\$2,823	\$0	\$0	(\$308)	(\$201)	\$89	\$3,091	\$363	(\$2,728)	(\$55,728)
2017	\$0	\$174	\$2,848	\$0	\$0	(\$333)	(\$229)	\$99	\$3,129	\$388	(\$2,741)	(\$58,469)
2018	\$0	\$178	\$2,878	\$0	\$0	(\$359)	(\$261)	\$107	\$3,170	\$415	(\$2,754)	(\$61,223)
2019	\$0	\$183	\$2,908	\$0	\$0	(\$383)	(\$291)	\$115	\$3,215	\$444	(\$2,771)	(\$64,000)
2020	\$0	\$188	\$2,944	\$0	\$0	(\$408)	(\$323)	\$123	\$3,264	\$470	(\$2,794)	(\$66,800)
2021	\$0	\$193	\$2,983	\$0	\$0	(\$437)	(\$357)	\$141	\$3,317	\$498	(\$2,816)	(\$69,616)
2022	\$0	\$198	\$3,028	\$0	\$0	(\$467)	(\$392)	\$160	\$3,375	\$528	(\$2,848)	(\$72,464)
2023	\$0	\$204	\$3,073	\$0	\$0	(\$498)	(\$429)	\$180	\$3,437	\$560	(\$2,877)	(\$75,341)
2024	\$0	\$208	\$3,124	\$0	\$0	(\$532)	(\$468)	\$181	\$3,504	\$593	(\$2,911)	(\$78,252)
2025	\$0	\$215	\$3,180	\$0	\$0	(\$568)	(\$509)	\$181	\$3,575	\$627	(\$2,948)	(\$81,204)
2026	\$0	\$220	\$3,239	\$0	\$0	(\$607)	(\$552)	\$182	\$3,652	\$662	(\$2,989)	(\$84,215)
Normal NPV		\$4,643	\$65,863			(\$7,336)	(\$1,453)	\$2,435	\$72,961	\$4,788	(\$68,173)	(\$84,173)
Discount Rate =		\$1,513	\$32,180			(\$1,559)	(\$478)	\$532	\$34,225	\$1,465	(\$32,239)	(\$32,239)
Benefit/Cost Ratio =		0.08										

PIC Form CE 2.4
Page 1 of 1
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Participant Cost-Efficiency Measures
Cost-Efficiency Analysis per Rule 25-17.008 Florida Administrative Code

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
Year	Customer Equity Costs (\$000s)	Customer O&M Costs (\$000s)	Other Costs (\$000s)	Other Benefits (\$000s)	Change in Participant Electric Bills (\$000s)	Tax Credits (\$000s)	Utility Fuel Rebates & Incentives (\$000s)	Total Costs (\$000s)	Total Benefits (\$000s)	Total Net Benefits (\$000s)	Cumulative Net Benefits (\$000s)
1997	\$3,000	(\$100)	\$0	\$0	\$10	\$0	\$75	\$3,010	\$180	(\$2,830)	(\$2,830)
1998	\$3,079	(\$219)	\$0	\$0	\$18	\$0	\$77	\$3,008	\$287	(\$2,721)	(\$5,551)
1999	\$3,191	(\$315)	\$0	\$0	\$27	\$0	\$79	\$3,168	\$384	(\$2,784)	(\$8,335)
2000	\$3,244	(\$420)	\$0	\$0	\$38	\$0	\$81	\$3,200	\$501	(\$2,700)	(\$11,035)
2001	\$3,330	(\$529)	\$0	\$0	\$45	\$0	\$83	\$3,375	\$608	(\$2,767)	(\$13,802)
2002	\$3,418	(\$630)	\$0	\$0	\$55	\$0	\$85	\$3,473	\$715	(\$2,758)	(\$16,560)
2003	\$3,508	(\$730)	\$0	\$0	\$64	\$0	\$88	\$3,572	\$823	(\$2,749)	(\$19,309)
2004	\$3,601	(\$840)	\$0	\$0	\$74	\$0	\$90	\$3,675	\$930	(\$2,745)	(\$22,054)
2005	\$3,698	(\$949)	\$0	\$0	\$83	\$0	\$92	\$3,776	\$1,037	(\$2,741)	(\$24,805)
2006	\$3,793	(\$1,060)	\$0	\$0	\$94	\$0	\$95	\$3,887	\$1,145	(\$2,742)	(\$27,547)
2007	\$3,893	(\$1,180)	\$0	\$0	\$108	\$0	\$97	\$3,989	\$1,253	(\$2,736)	(\$30,283)
2008	\$3,995	(\$1,300)	\$0	\$0	\$117	\$0	\$100	\$4,113	\$1,360	(\$2,753)	(\$33,036)
2009	\$4,102	(\$1,430)	\$0	\$0	\$127	\$0	\$103	\$4,229	\$1,468	(\$2,761)	(\$35,797)
2010	\$4,210	(\$1,570)	\$0	\$0	\$138	\$0	\$105	\$4,348	\$1,575	(\$2,773)	(\$38,570)
2011	\$4,321	(\$1,710)	\$0	\$0	\$148	\$0	\$108	\$4,470	\$1,683	(\$2,787)	(\$41,357)
2012	\$4,435	(\$1,860)	\$0	\$0	\$159	\$0	\$111	\$4,595	\$1,791	(\$2,804)	(\$44,161)
2013	\$4,553	(\$1,990)	\$0	\$0	\$173	\$0	\$114	\$4,725	\$1,899	(\$2,826)	(\$46,987)
2014	\$4,673	(\$2,100)	\$0	\$0	\$188	\$0	\$117	\$4,858	\$2,007	(\$2,851)	(\$49,838)
2015	\$4,795	(\$2,200)	\$0	\$0	\$199	\$0	\$120	\$4,986	\$2,115	(\$2,871)	(\$52,709)
2016	\$4,923	(\$2,300)	\$0	\$0	\$219	\$0	\$123	\$5,142	\$2,223	(\$2,919)	(\$55,628)
2017	\$5,053	(\$2,400)	\$0	\$0	\$244	\$0	\$126	\$5,307	\$2,331	(\$2,976)	(\$58,604)
2018	\$5,186	(\$2,500)	\$0	\$0	\$264	\$0	\$130	\$5,480	\$2,440	(\$3,040)	(\$61,644)
2019	\$5,323	(\$2,610)	\$0	\$0	\$283	\$0	\$133	\$5,608	\$2,548	(\$3,060)	(\$64,704)
2020	\$5,464	(\$2,720)	\$0	\$0	\$304	\$0	\$137	\$5,767	\$2,657	(\$3,110)	(\$67,814)
2021	\$5,603	(\$2,820)	\$0	\$0	\$325	\$0	\$140	\$5,933	\$2,765	(\$3,168)	(\$70,982)
2022	\$5,750	(\$2,920)	\$0	\$0	\$348	\$0	\$144	\$6,103	\$2,874	(\$3,229)	(\$74,211)
2023	\$5,908	(\$3,020)	\$0	\$0	\$369	\$0	\$148	\$6,278	\$2,983	(\$3,295)	(\$77,506)
2024	\$6,064	(\$3,120)	\$0	\$0	\$393	\$0	\$152	\$6,457	\$3,092	(\$3,365)	(\$80,871)
2025	\$6,225	(\$3,240)	\$0	\$0	\$418	\$0	\$156	\$6,642	\$3,201	(\$3,441)	(\$84,312)
2026	\$6,389	(\$3,360)	\$0	\$0	\$444	\$0	\$160	\$6,833	\$3,310	(\$3,523)	(\$87,835)
2027	\$6,558	(\$3,480)	\$0	\$0	\$468	\$0	\$160	\$7,023	\$3,419	(\$3,604)	(\$91,439)
2028	\$6,730	(\$3,600)	\$0	\$0	\$491	\$0	\$160	\$7,213	\$3,528	(\$3,685)	(\$95,124)
2029	\$6,905	(\$3,720)	\$0	\$0	\$515	\$0	\$160	\$7,403	\$3,637	(\$3,766)	(\$98,890)
2030	\$7,083	(\$3,840)	\$0	\$0	\$539	\$0	\$160	\$7,593	\$3,746	(\$3,847)	(\$102,737)

Numbered \$134,708 (\$48,825)
NYU \$43,888 (\$11,718)
Discount Rate = 8.7%
Benefit-Cost Ratio = 0.73

PSC Form CE 2.5
 Page 1 of 1
 Run Date: 31-Mar-87
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Ratepayer Impact Cost-Effectiveness Measure
 Cost-Effectiveness Analysis per Rule 25-17.000 Florida Administrative Code

Year	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
	Change in Electric Supply Costs (\$000s)	Utility Profit Reduction & Incentives (\$000s)	Change in Electric Revenues (\$000s)	Incremental Generation Cap Costs (\$000s)	Incremental TLD Cap Costs (\$000s)	Incremental Prog Induced Fuel Costs (\$000s)	Other Costs (\$000s)	Other Benefits (\$000s)	Total Costs (\$000s)	Total Benefits (\$000s)	Total Net Benefits to All Customers (\$000s)	Cumulative Discounted Net Benefits (\$000s)
1987	50	\$160	\$75	\$10	\$5	\$3	50	50	\$181	\$9	\$190	(\$162)
1988	50	\$108	\$77	\$12	\$12	\$6	50	50	\$180	\$9	\$189	(\$138)
1989	50	\$108	\$79	\$27	\$28	\$10	50	50	\$198	\$7	\$205	(\$121)
2000	50	\$112	\$81	\$28	\$29	\$14	50	50	\$207	\$10	\$217	(\$108)
2001	50	\$115	\$85	\$45	\$32	\$16	50	50	\$218	\$12	\$230	(\$147)
2002	50	\$118	\$85	\$55	\$34	\$22	50	50	\$228	\$15	\$243	(\$180)
2003	50	\$121	\$88	\$64	\$38	\$28	50	50	\$237	\$18	\$255	(\$212)
2004	50	\$124	\$90	\$74	\$42	\$34	50	50	\$248	\$21	\$269	(\$244)
2005	50	\$127	\$92	\$83	\$46	\$38	50	50	\$258	\$23	\$281	(\$276)
2006	50	\$131	\$95	\$94	\$49	\$42	50	50	\$268	\$26	\$294	(\$308)
2007	50	\$134	\$97	\$108	\$53	\$48	50	50	\$278	\$29	\$307	(\$340)
2008	50	\$138	\$100	\$117	\$57	\$54	50	50	\$292	\$31	\$323	(\$372)
2009	50	\$141	\$103	\$127	\$63	\$63	50	50	\$307	\$34	\$341	(\$404)
2010	50	\$145	\$105	\$138	\$69	\$72	50	50	\$323	\$37	\$360	(\$436)
2011	50	\$148	\$108	\$148	\$77	\$81	50	50	\$334	\$40	\$374	(\$468)
2012	50	\$153	\$111	\$159	\$87	\$92	50	50	\$344	\$43	\$387	(\$500)
2013	50	\$157	\$114	\$173	\$96	\$98	50	50	\$352	\$47	\$399	(\$532)
2014	50	\$161	\$117	\$188	\$106	\$103	50	50	\$361	\$51	\$412	(\$564)
2015	50	\$165	\$120	\$199	\$116	\$112	50	50	\$377	\$54	\$431	(\$596)
2016	50	\$170	\$123	\$219	\$128	\$122	50	50	\$392	\$58	\$450	(\$628)
2017	50	\$174	\$126	\$244	\$142	\$137	50	50	\$407	\$62	\$469	(\$660)
2018	50	\$179	\$130	\$264	\$158	\$151	50	50	\$423	\$67	\$490	(\$692)
2019	50	\$183	\$133	\$283	\$176	\$167	50	50	\$439	\$72	\$511	(\$724)
2020	50	\$188	\$137	\$304	\$196	\$182	50	50	\$457	\$77	\$534	(\$756)
2021	50	\$193	\$140	\$325	\$217	\$198	50	50	\$474	\$82	\$556	(\$788)
2022	50	\$198	\$144	\$346	\$240	\$216	50	50	\$493	\$87	\$579	(\$820)
2023	50	\$204	\$148	\$369	\$265	\$236	50	50	\$512	\$92	\$604	(\$852)
2024	50	\$209	\$152	\$393	\$291	\$258	50	50	\$531	\$97	\$628	(\$884)
2025	50	\$215	\$156	\$416	\$318	\$281	50	50	\$551	\$102	\$651	(\$916)
2026	50	\$220	\$160	\$444	\$344	\$306	50	50	\$572	\$107	\$679	(\$948)
2027	50	\$226	\$164	\$474	\$372	\$332	50	50	\$594	\$112	\$706	(\$980)
2028	50	\$232	\$168	\$504	\$400	\$359	50	50	\$617	\$117	\$734	(\$1012)
2029	50	\$238	\$172	\$534	\$428	\$386	50	50	\$640	\$122	\$762	(\$1044)
2030	50	\$244	\$176	\$564	\$456	\$413	50	50	\$663	\$127	\$790	(\$1076)
2031	50	\$250	\$180	\$594	\$484	\$440	50	50	\$686	\$132	\$818	(\$1108)
2032	50	\$256	\$184	\$624	\$512	\$467	50	50	\$709	\$137	\$846	(\$1140)
2033	50	\$262	\$188	\$654	\$540	\$494	50	50	\$732	\$142	\$874	(\$1172)
2034	50	\$268	\$192	\$684	\$568	\$521	50	50	\$755	\$147	\$902	(\$1204)
2035	50	\$274	\$196	\$714	\$596	\$548	50	50	\$778	\$152	\$930	(\$1236)
2036	50	\$280	\$200	\$744	\$624	\$575	50	50	\$801	\$157	\$958	(\$1268)
2037	50	\$286	\$204	\$774	\$652	\$602	50	50	\$824	\$162	\$986	(\$1300)
2038	50	\$292	\$208	\$804	\$680	\$629	50	50	\$847	\$167	\$1014	(\$1332)
2039	50	\$298	\$212	\$834	\$708	\$656	50	50	\$870	\$172	\$1042	(\$1364)
2040	50	\$304	\$216	\$864	\$736	\$683	50	50	\$893	\$177	\$1070	(\$1396)
2041	50	\$310	\$220	\$894	\$764	\$710	50	50	\$916	\$182	\$1098	(\$1428)
2042	50	\$316	\$224	\$924	\$792	\$737	50	50	\$939	\$187	\$1126	(\$1460)
2043	50	\$322	\$228	\$954	\$820	\$764	50	50	\$962	\$192	\$1154	(\$1492)
2044	50	\$328	\$232	\$984	\$848	\$791	50	50	\$985	\$197	\$1182	(\$1524)
2045	50	\$334	\$236	\$1014	\$876	\$818	50	50	\$1008	\$202	\$1210	(\$1556)
2046	50	\$340	\$240	\$1044	\$904	\$845	50	50	\$1031	\$207	\$1238	(\$1588)
2047	50	\$346	\$244	\$1074	\$932	\$872	50	50	\$1054	\$212	\$1266	(\$1620)
2048	50	\$352	\$248	\$1104	\$960	\$899	50	50	\$1077	\$217	\$1294	(\$1652)
2049	50	\$358	\$252	\$1134	\$988	\$926	50	50	\$1100	\$222	\$1322	(\$1684)
2050	50	\$364	\$256	\$1164	\$1016	\$953	50	50	\$1123	\$227	\$1350	(\$1716)
2051	50	\$370	\$260	\$1194	\$1044	\$980	50	50	\$1146	\$232	\$1378	(\$1748)
2052	50	\$376	\$264	\$1224	\$1072	\$1007	50	50	\$1169	\$237	\$1406	(\$1780)
2053	50	\$382	\$268	\$1254	\$1100	\$1034	50	50	\$1192	\$242	\$1434	(\$1812)
2054	50	\$388	\$272	\$1284	\$1128	\$1061	50	50	\$1215	\$247	\$1462	(\$1844)
2055	50	\$394	\$276	\$1314	\$1156	\$1088	50	50	\$1238	\$252	\$1490	(\$1876)
2056	50	\$400	\$280	\$1344	\$1184	\$1115	50	50	\$1261	\$257	\$1518	(\$1908)
2057	50	\$406	\$284	\$1374	\$1212	\$1142	50	50	\$1284	\$262	\$1546	(\$1940)
2058	50	\$412	\$288	\$1404	\$1240	\$1169	50	50	\$1307	\$267	\$1574	(\$1972)
2059	50	\$418	\$292	\$1434	\$1268	\$1196	50	50	\$1330	\$272	\$1602	(\$2004)
2060	50	\$424	\$296	\$1464	\$1296	\$1223	50	50	\$1353	\$277	\$1630	(\$2036)
2061	50	\$430	\$300	\$1494	\$1324	\$1250	50	50	\$1376	\$282	\$1658	(\$2068)
2062	50	\$436	\$304	\$1524	\$1352	\$1277	50	50	\$1399	\$287	\$1686	(\$2100)
2063	50	\$442	\$308	\$1554	\$1380	\$1304	50	50	\$1422	\$292	\$1714	(\$2132)
2064	50	\$448	\$312	\$1584	\$1408	\$1331	50	50	\$1445	\$297	\$1742	(\$2164)
2065	50	\$454	\$316	\$1614	\$1436	\$1358	50	50	\$1468	\$302	\$1770	(\$2196)
2066	50	\$460	\$320	\$1644	\$1464	\$1385	50	50	\$1491	\$307	\$1798	(\$2228)
2067	50	\$466	\$324	\$1674	\$1492	\$1412	50	50	\$1514	\$312	\$1826	(\$2260)
2068	50	\$472	\$328	\$1704	\$1520	\$1439	50	50	\$1537	\$317	\$1854	(\$2292)
2069	50	\$478	\$332	\$1734	\$1548	\$1466	50	50	\$1560	\$322	\$1882	(\$2324)
2070	50	\$484	\$336	\$1764	\$1576	\$1493	50	50	\$1583	\$327	\$1910	(\$2356)
2071	50	\$490	\$340	\$1794	\$1604	\$1520	50	50	\$1606	\$332	\$1938	(\$2388)
2072	50	\$496	\$344	\$1824	\$1632	\$1547	50	50	\$1629	\$337	\$1966	(\$2420)
2073	50	\$502	\$348	\$1854	\$1660	\$1574	50	50	\$1652	\$342	\$1994	(\$2452)
2074	50	\$508	\$352	\$1884	\$1688	\$1601	50	50	\$1675	\$347	\$2022	(\$2484)
2075	50	\$514	\$356	\$1914	\$1716	\$1628	50	50	\$1698	\$352	\$2050	(\$2516)
2076	50	\$520	\$360	\$1944	\$1744	\$1655	50	50	\$1721	\$357	\$2078	(\$2548)
2077	50	\$526	\$364	\$1974	\$1772	\$1682	50	50	\$1744	\$362	\$2106	(\$2580)
2078	50	\$532	\$368	\$2004	\$1800	\$1709	50	50	\$1767	\$367	\$2134	(\$2612)
2079	50	\$538	\$372	\$2034	\$1828	\$1736	50	50	\$1790	\$372	\$2162	(\$2644)
2080	50	\$544	\$376	\$2064	\$1856	\$1763	50	50	\$1813	\$377	\$2190	(\$2676)
2081	50	\$550	\$380	\$2094	\$1884	\$1790	50	50	\$1836	\$382	\$2218	(\$2708)
2082	50	\$556	\$384	\$2124	\$1912	\$1817	50	50	\$1859	\$387	\$2246	(\$2740)
2083	50	\$562	\$388	\$2154	\$1940	\$1844	50	50	\$1882	\$392	\$2274	(\$2772)
2084	50	\$568	\$392	\$2184	\$1968	\$1871	50	50	\$1905	\$397	\$2302	(\$2804)
2085	50	\$574	\$396	\$2214	\$1996	\$1898	50	50	\$1928	\$402	\$2330	(\$2836)
2086	50	\$580	\$400	\$2244	\$2024	\$1925	50	50	\$1951	\$407	\$2358	(\$2868)
2087	50	\$586	\$404	\$2274	\$2052	\$1952	50	50	\$1974	\$412	\$2386	(\$2900)
2088	50	\$592	\$408	\$2304	\$2080	\$1979	50	50	\$1997	\$417	\$2414	(\$2932)
2089	50	\$598	\$412	\$2334	\$2108	\$2006	50	50	\$2020	\$422	\$2442	(\$2964)
2090	50	\$604	\$416	\$2364	\$2136	\$2033	50	50	\$2043	\$427	\$2470	(\$2996)
2091	50	\$610	\$420	\$2394	\$2164	\$2060	50	50	\$2066	\$432	\$2498	(\$3028)
2092	50	\$616	\$424	\$2424	\$2192	\$2087	50	50	\$2089	\$437	\$2526	(\$3060)
2093	50	\$622	\$428	\$2454	\$2220	\$2114	50	50	\$2112	\$442	\$2554	(\$3092)
2094	50	\$628	\$432	\$2484	\$2248	\$2141	50	50	\$2135	\$447	\$2582	(\$3124)
2095	50	\$634	\$436	\$2514	\$2276	\$2168	50	50	\$2158	\$452	\$2610	(\$3156)
2096	50	\$640	\$440	\$2544	\$2304	\$2195	50	50	\$2181	\$457	\$2638	(\$3188)
2097	50	\$646	\$444	\$2574	\$2332	\$2222	50	50	\$2204	\$462	\$2666	(\$3220)
2098	50	\$652	\$448	\$2604	\$2360	\$2249	50	50	\$2227	\$467	\$2694	(\$3252)
2099	50	\$658	\$452	\$2634	\$2388	\$2276	50	50	\$2250	\$472	\$2722	(\$3284)
2100	50	\$664	\$456	\$2664	\$2416	\$2303	50	50	\$2273	\$477	\$2750	(\$3316)
2101	50	\$670	\$460	\$2694	\$2444	\$2330	50	50	\$2296	\$482	\$2778	(\$3348)
2102	50	\$676	\$464	\$2724	\$2472	\$2357	50	50	\$2319	\$487	\$2806</	