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January 21, 1998

HAND-DELIVERED

Blanca S. Bayo, Director  
Division of Records and Reporting  
Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

Re: Docket Nos. 971004-EG, 971005-EG, 971006-EG & 971007-EG

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and fifteen copies of Florida Industrial Power Users Group's Comments in the above dockets.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

CK \_\_\_\_\_ Sincerely,

FA \_\_\_\_\_

PP \_\_\_\_\_ *Vicki Gordon Kaufman*  
AF \_\_\_\_\_ Vicki Gordon Kaufman

MU \_\_\_\_\_

TR \_\_\_\_\_ VGK/pw  
AG *Stutrell* \_\_\_\_\_ Enclosures

EG 1 \_\_\_\_\_

JN \_\_\_\_\_

JPC \_\_\_\_\_

RON \_\_\_\_\_

SEC 1 \_\_\_\_\_

WAS \_\_\_\_\_

OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE  
01135 JAN 21 88  
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ORIGINAL

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Adoption of Numeric Conservation Goals by Florida Power & Light Company.	)	Docket No. 971004-EG
_____	)	
In Re: Adoption of Numeric Conservation Goals by Florida Power Corporation.	)	Docket No. 971005-EG
_____	)	
In Re: Adoption of Numeric Conservation Goals by Gulf Power Company.	)	Docket No. 971006-EG
_____	)	
In Re: Adoption of Numeric Conservation Goals by Tampa Electric Company.	)	Docket No. 971007-EG
_____	)	Filed: January 21, 1998

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S COMMENTS**

The Florida Industrial Power Users Group (FIPUG), pursuant to Staff's request at the workshop held in this docket on January 7, 1998, files the following comments on issues raised at that workshop.

1. As has been discussed at some length in the two workshops held in this proceeding, the prior conservation goals proceeding was lengthy, time-consuming and expensive. FIPUG would point out that this was the case not only for the utilities (who, of course, did the analysis of the various measures and programs) but for Intervenors, such as FIPUG, as well. The amount of material generated, the number of meetings and depositions held and the length of the hearing itself made participation in the prior goals proceeding very costly.

2. FIPUG suggests that the Commission not repeat the prior goals process but rather build on it and use what was learned in that docket to move forward in this docket. To that end, FIPUG believes, as it appears that the other parties do, that it is unnecessary to repeat the SRC analysis. FIPUG further believes, again as most of the parties do (with

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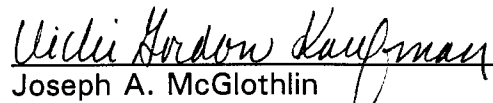
FPSC-RECORDS/REPORTING

the exception of LEAF) that it is unnecessary to "reanalyze" measures that did not pass the RIM test in the last proceeding. Given the utilities' declining costs, as illustrated by the FPL handout, it is very unlikely that measures that did not pass RIM in the prior proceeding will now pass. It will greatly increase the burden on parties without any concomitant benefit if time is spent analyzing measures that cannot possibly be cost-effective. Thus, FIPUG supports narrowing the measures for analyses.

3. As to any cost-effectiveness analysis that is performed, FIPUG agrees that such analysis should be made only on the basis of the RIM test. The Commission made it clear in its last goals order that RIM, not TRC, is the appropriate cost-effectiveness standard:

We find that goals based on measures that pass TRC but not RIM would result in increased rates and would cause customers who do not participate in a utility DSM measure to subsidize customers who do participate.

Order No. PSC-94-1313-FOF-EG at 22. Thus, RIM should be the standard used in this proceeding.

  
\_\_\_\_\_  
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Attorneys for Florida Industrial  
Power Users Group

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the **Florida Industrial Power Users Group's Comments** has been furnished by Hand Delivery\* or by U.S. Mail to the following parties of record, this **21st** day of **January, 1998**:

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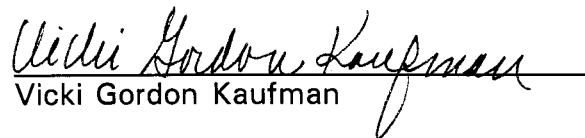
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