ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

CALCS PLUS

TESTIMONY OF JON F. KLONGERBO

DOCKET NOS. 040029-EG, 040660-EG

AUGUST 12, 2005

1. Please state your name, current position and address.

Jon F. Klongerbo, an individual and Florida East Coast Director of Calcs-Plus, residing at 1351 Park Avenue, Titusville, FL 32780, and a FPL ratepayer under residential account # 84452-34043.

2. Please provide us your educational background and any special credentials or training that you have received relevant to your testimony in this case.

Bachelor of Science Business Administration, University of Florida, 1987

MBA, University of Central Florida, 1993

Certified Class 1 Energy Rater

3. Please provide us with your past and present professional association memberships and positions you have held in those associations.

Current Member, National Energy Raters Association (NERA)

Past Board Member on (NERA)

4. Please provide us with a brief statement of your background and experience in the areas of building science, standards of building practice and programs involving residential energy efficiency and conservation.

CMP
COM 3
CTR orig
ECR
GCL 1
OPC
RCA
SCR
SGA
SEC 1
OTH

I have conducted hundreds of Energy Ratings and on site inspections to collect data collect on residential structures for various research projects as well as various diagnostics projects. Provided technical expertise for the development of a mid-point, stand-alone duct testing system.

5. Describe your service offerings and prices.

Residential Energy Ratings for Home owners and Builders. Prices vary depending upon volume builder and custom builders and travel. Generally, $300 plus $50 each additional AC system for custom homes and $250 plus $50 each additional AC system for for tract homes.

Mid-Point duct testing. Test involves temporarily sealing of register boxes and pressurizing the system, introducing theatrical fog and sealing visible leaks. Standard fees are $300 plus $50 each additional AC system.

State Energy Code and room by room load calculations (fees posted at www.calcs-plus.com). $5 per room for load calculations. Fees for Energy Code calculations based upon $50 for homes up to 1500 sq. ft. $5 for each 500 sq. ft thereafter.

6. How many ratings have you performed over last 5 years? Last year?

Last five years: Approximately 240. Last Year: Approximately 50.

7. How many code calculations have your performed and filed over last 5 years? Last year?

Basic code calculations are submitted with the rating (a subset of the rating). Our East Coast Office has processed approximately 150 combination load and code calculations in the last year and approximately 400 load and code combination calculations since Jan 2003.

8. Are you familiar with the FPL BuildSmart program? If so, please describe your involvement or experience with it.

Yes. Program is based upon 3 levels, Gold, Silver and Bronze depending upon various energy efficiency levels. Benchmarks are based upon the States Energy Code e-ratio (Referred to as "EPI Rating" by FPL staff). May include a free BERS Rating for Energy Star certification. My involvement is very limited with BuildSmart as I have educated builders on Federal Energy Efficiency programs and have lost clients to free BERS ratings offerings by utilities. One example would be Accessible Structures, Inc, Titusville Florida, who was contacted and educated by Calcs-Plus for Energy Star ratings. The client was enthusiastic and was invited to the Florida Housing Coalition by Tei Kucharski to provide a presentation on conscientious Builder's practices. At that meeting, Ms. Holly Duquette, the FPL BuildSmart Representative, recruited the builder into the BuildSmart program with enticed "Free" ratings. Subsequently, educational efforts for Builders has ceased in that territory. No marketing or educational activities are expended in service areas that are serviced by utilities that give away BERS ratings. Almost all of my rating business is conducted in Kissimmee and KUA service territory.

9. Compare the services provided under the BuildSmart program with the services you generally offer and with the services you offer when you rate a home.

My on-site services include duct testing with a blower door and duct tester. The tests include duct leakage both within and outside conditioned spaces. This is commonly referred to as "Total" and "Out" tests. It is my understanding that FPL uses the "Pressure Pan" method which estimates leakage instead of measuring the CFM (cubic feet per

minute) leakage measured by the calibrated duct tester, digital manometer and blower door assembly. I rate the homes using the Energy Gauge software, register the rating with the Florida Solar Energy Center (FSEC) and providing the report to the client. I am not familiar with the method that FPL measures duct leakage at the mid-point level. It seem to not be possible with the pressure pan method as the building shell must be de-pressurized in comparison with the outside environment which would not be possible without the drywall installed. In any event, I have found that taking leakage rates during mid-point inspect is not an accurate method for predicting final leakage after drywall and the air handler is installed (especially with the "Total" test. My mid-point test is concentrated on locating leaks at that point and sealing those visible leaks.

10. Have you observed any measurable difference in outcomes for homes in which you have provided rating service and homes that have received BuildSmart's basic or premier services? If so, please describe.

No, I have no first hand comparison because, as previously stated, my work is almost exclusively out of FPL service territory.

11. What duct testing protocol was used on the homes described in your answer to 10.above by you; by FPL?

Please see answer 9 and 10 above.

12. Have you reviewed any homes that have received code calculations from FPL, including an e-ratio, and how has the as-built aspect of your review compared to their initial code calculations?

No.

13. Have you reviewed the initial pre-filed testimony of FPL's witnesses as submitted on July 15, 2005? If so, please comment on any concerns that are raised based on your experience and not included in your response to another question.

Yes, Mr. Haywood's Testimony of July 15th regarding the following questions to wit:

Q. Why does FPL propose to eliminate Program participation fees?

A. *During interviews with decision makers from major production builder firms, FPL uncovered that program participation fees were viewed as a major impediment to builder participation. Builders, and especially the large volume production builders that are necessary for the program to achieve scale economies, voiced their objections to paying per-home participation fees in addition to the investments they must make to achieve e-Ratio levels necessary for participation in the Buildsmart program. These builders believe that the cost increases associated with the home upgrades necessary to be a BuildSmart participant represent the "cost of entry." In effect, program participation fees act as a deterrent to production builder participation, which limits the Buildsmart Program's ability to fully tap this large market."*

There are areas in the State where energy-efficiency programs thrive with a participation fee or charges for services. It is unclear why there is such a low market penetration for the BuildSmart Program, but to infer that because there is a miniscule charge for testing and verification when home prices are at an all time high is puzzling. It is further puzzling since a portion of the program (Gold Level, Basic). has been offering Free BERS Ratings by FPL without participation fees.

Q. How does the proposed redesigned Buildsmart Program interact with the DOE's and EPA's ENERGY STARB Program and other new home construction programs?

A. FPL will continue to advocate and promote the FGBC's green building standards through Buildsmart. Through increased promotional activities, FPL will enhance the Program's support of ENERGY STARB. As ENERGY STARB participation criteria is modified, BuildSmart representatives will also educate local builders on these changes and provide recommendations for how builders may achieve ENERGY STARB certification under any revised criteria. All of these activities will further facilitate builders' involvement in ENERGY STAR and FGBC' s Green Building certification."

Currently, any the Bronze and Silver levels do not have any bearing on the Florida Green Building Certification. The BuildSmart Gold Level can only influence the FGBC certification if a HERS Rating is performed on the home, a standard not promoted by FPL because of the duct testing methods involved. Pressure Pan testing is not a recognized protocol for duct testing for a HERS Rating or BERS Class 1 Rating.

Q. "How will FPL's proposed Program modifications promote ENERGY STAR certification?

A. Builder incentives, such as cooperative advertising incentives of up to $50 per home, will be available to builders for qualifying Buildsmart homes that also achieve certification through DOE's and EPA's ENERGY STARB program. Additionally, eliminating BuildSmart participation fees and providing incentives to builders further strengthens Buildsmart's ability to partner with

private raters - who will charge an additional fee for their rating services - thereby creating a complement of services to those builders seeking ENERGY STAR certification, and creating a collaborative approach that strengthens both Buildsmart's and the raters' value proposition to these builders."

This answer is contradictory to the reason for eliminating participation fees to increase market penetration. To eliminate program fees but to increase the cost to builder's by hiring private raters - who will charge an additional rating fee is perplexing.

"Q. Describe the two certification approaches: flexible measure and prescriptive measure approach.

A. *Each approach is targeted at a specific market's needs. The Prescriptive approach is targeted at meeting the needs of the production builder/homebuyer market and will include measures related to HVAC, ductwork and insulation. Under the prescriptive approach, to receive Buildsmart certification, a home must include specific prescriptive energy efficiency measures targeted to achieve an e-Ratio value at least 10% better than a baseline home as prescribed by the Florida Energy Efficiency Code. Under this approach, builders must submit to FPL plans or specifications that FPL can use to validate that the installed measures meet Buildsmart prescriptive requirements.*

The Flexible approach is targeted at the custom builder/homebuyer market and will allow any combination of measures necessary to achieve an e-Ratio value at least 20% better than a baseline home as prescribed by the Florida Energy Efficiency Code."

This is contradictory to the reasoning for eliminating Bronze, Silver and Gold levels – to eliminate confusion. There proposal now has Flexible and Prescriptive Programs, one with 10% efficiency and one with 20% increased efficiency. There is no distinction between the two different programs for homeowners to know if they have a 10% BuildSmart home or a 20% BuildSmart home.

14. What is your opinion of the proposed Prescriptive Program proposed by FPL?

I don't see any benefit to the prescriptive method for the following reasons:

1. Different efficiency levels causing confusion on which BuildSmart Program equates to what efficiency. One BuildSmart House will be scored based upon a 10% increase in energy efficiency and one scored based upon 20%. There is no disclosure to the homeowner to which standard is used.

2. Prescriptive program involves use of the Pressure Pan testing methodology which would result in an artificially low result for leakage. The builder and/or homeowner will be lured into a false sense of energy-efficiency.

3. No provisions for quality control by a 3rd party entity.

4. Not an efficient use of resources to support two programs.

15. Are you familiar with other jurisdictions' efforts to measure and regulate residential building practices and, if so, can you summarize their various approaches?

I am not familiar with other states programs. I am familiar with other Utilities programs in Florida.

Progress Energy's Program is based on the HERS and Energy Star Program. The main differences with that program are that they only test and inspect 1 out of 7 houses and, if

that one house passes the HERS score criteria, than the rest are assumed to be Energy Star compliant. The other significant difference is that they will only include homes in their program that have electric heat pumps. Their BERS Ratings are offered for free. Orlando Utilities Corporation (OUC) offers free BERS Ratings and tests every house. All the other utilities, to the best of my knowledge, offer BERS Ratings for the fee filed as their tariff and/or offer marketing and educational assistance.

16. Are there national standards for the development of comparative information about the relative energy efficiency of a residential unit?

Yes, the Home Energy Rating System (HERS) is the most recognized standard in the country. Florida and national-based programs that use this national standard as at least a portion of their certification is The Energy Star program, the Building America program and the Florida Green Building Certification.

17. How do you believe any residential program purporting to increase residential building energy efficiencies should be measured and monitored?

To alleviate confusion, one standard should be used for measurement that is understandable, realistic and enforceable. A third-party, respected entity should have the authority to randomly select homes for on-site re-inspection and re-testing of homes for adherence to standards. This party should also have the authority to investigate consumer complaints. In the event of non-compliance to standards of the program, they should have the authority to administer administrative sanctions to reflect the severity of the non-compliance.

18. How does Florida assure its citizens fair, impartial and accurate information on the energy usage in their residences?

Unfortunately, I believe that Florida has conflicting programs under conflicting state governing and regulatory bodies that much confusion exists without unified educational and consistent policies to the citizens. For example, almost every utility has their unique demand side programs, there are national programs and a state energy code that may or may not have different benchmarks, testing protocols, level of different efficiencies, the sampling of homes for compliance, etc

19. How would you measure a residential unit's energy efficiency?

Specific standard would be based upon the HERS methodology. Although not perfect, it is based upon relatively sound research and is constantly evolving to reflect changing conditions and incorporating new products and techniques. It is also almost universally accepted nationally to reduce citizen's confusion concerning other local efficiency programs.

20. Recognizing that you are not an economist, but rather an educated layman and a FPL commercial and residential customer, how would you measure the cost effectiveness of any entity's program to enhance the energy efficiency of a residential unit?

In general terms, the cost of the program should not exceed what the private market can provide without reimbursement from outside sources. In other words, the program should be a market-driven and provide a marketable service with measurable savings that outweigh the upfront cost to the consumer.

21. In order to measure and monitor the success of any program to enhance the energy efficiency of a residential unit, how would you assure accurate information?

A third party quality control entity is crucial to ensure accuracy and for the integrity of the program with random field audits of inspected and tested homes. In addition that entity should be responsible for archiving the data for research, analysis of the success and evolving development of the program. Currently, the Florida Solar Energy Center fulfills all of those functions as a HERS provider.

22. If the program's direct costs are to be paid by someone other than the program operator, how would you assure a program designed to be effective yet minimize the cost burden on those that pay for it?

A competitive market and those related economic forces naturally attain a level of optimal efficiency. There will be a point where the value of the service equals the cost of the service via supply and demand forces. This will be the natural optimal cost effective point.

23. How would you assure maximum quality control to verify the results claimed for the program and the persistence of those results over time?

Please see answer 21.

Briefly, Table 1 in Exhibit I provides facts that suggests to me that FPL's BuildSmart program was not as cost effective as it could be and overly burdens the ratepayer when FPL applies for and receives cost recovery:

Clearly the program as developed and proposed by FPL results in a low percentage paid from program revenue (as opposed to alternative program including

ratings paid by customer); relatively low participation rates; high cost per home (more than the cost of either a utility or independent rating).

An easily understood alternative programif FPL desires to provide subsidized services in this area, can been seen in Table 2 in Exhibit I, and have a significantly less impact on the FPL ratepayer.

24. Are there other residential new construction programs offered by utilities that meet the standards you have outlined and enhance, rather than destroy, the free, competitive marketplace for energy efficient services?

As developed by FPL, the Build Smart program is unique to them. Other utilities have programs directed at new residential construction but none identical to FPL's. The municipal utility that comes first to my mind is at Gainesville Regional Utility ("GRU"). It was recognized as "Utility of the Year" by the EPA Energy Star program for its aggressive behavior to institute energy efficiency practices in residential new construction in its territory. Its program demonstrates highly successful performance without costing its ratepayers.

After its initial assistance to introduce the Energy Star Homes label to builders in the Gainesville territory (and in the surrounding territory as well), GRU made its corporate decision not to provide rating services but rather support the efforts of independent raters and "energy star" builders. It merely lists them on its website at virtually no cost to the utility.

Table 3 in Exhibit I, still in its developmental stage, is drawn from the EPA Energy Star homes site. It overstates the allocation of energy star homes to FPL and PEF programs because it allocates all the homes of one of their allied builders to the

respective utility. We know for a fact that many of the homes of certain builders have received support from Orlando Utilities Commission ("OUC") and independent raters as well. The figures showing new starts (market universe) are also in development. The figures shown are taken from the USDOE Building Code Assistance Program ("BCAP") and are in conflict with some data reported by the utilities. However, even with this bias, you can see that the GRU-type program utilizing the strengths of the independent rater and the competitive private sector far surpasses the market penetration of the costly (to ratepayers) utility programs.

Other state programs come from the EPA and USDOE sites mentioned above and demonstrate that Florida, although among the leading home-building states in the nation ranks in the bottom third of energy star home penetration in its market

25. Why do you believe that FPL's program is subsidized and provides an undue benefit to FPL in its attempt to provide services in a competitive marketplace?

The funds that FPL recovers from ECCR are part of a compulsory contribution from the ratepayers. As such, they are similar to collections based on its basic rate. In fact, the total of all additional charges imposed by various "add-on" compulsory charges authorized by the Commission amount to more revenue to FPL than its basic rate recovery. In every sense of the word, these "add-on" amounts are calculated similar to the base rate on the ratepayer bill through surcharges. The money only subsidizes FPL expenditures similar to their expenditures, including profits, derived from its customer billing. In 2004, 91% of BuildSmart costs were borne by the aggregate ratepayer base, whereas 0 % of free market, independent operated BERS rating activities were subsidized by the aggregate rate-payer base.

The average cost per BuildSmart home in 2004 by FPL was $488 with as little as 10% improvement in efficiency. This is in comparison to $250-$350/home for an Energy Star Home rated by Independently-operated businesses with 20-30% increase in energy efficiency. The homes rated under the BERS Program are more cost-effective than those under the FPL program subsidized by the ECCR fund, however, there exists no methodology to calculate the DSM savings and effects by the substitution effect of the free-market, unsubsidized marketplace. It could be argued that the BuildSmart Program generally is detrimental to free-market programs as it is unwarranted competition with more efficient market-driven programs and which would not exist if not for the $1,032,589 charged to the ratepayers through surcharges in 2004. See for example, the impact in the Gainesville Regional Utility territory that I described in the answer to an earlier question.

26. How much has FPL recovered from the ratepayers for its entry into the energy efficiency services market for new residential construction?

FPL's BuildSmart' Program ratepayer recovery provided to the PSC, the total ECCR Recovery from years 2002-2004 is over $2,200,000 without accounting for the additional ~$1.2 million for projected recovery totals for 2005. See following table. If you go from initial program year, including the study period, this sum would triple.

As asserted previously, new construction programs administered by private industry result in no funds charged to FPL's ratepayers, yielding a savings of over $3.4 millions in savings to FPL ratepayers through elimination of the compulsory contribution for the program, and would result in improved energy efficiency savings overall.

27. Why do you believe the BuildSmart program should use the Energy Star home offered by the federal government and supported by the state?

It is my belief that the nationally recognized label of an Energy Star home should be integrated into any Florida program encouraging energy efficient building practices. This allows the national investment in developing market conditions to provide support to the Florida program and assures greater communication with customers. It also uses nationally recognized standards, enhances and simplifies customer confidence and provides a clear benchmark for customers to distinguish a truly energy efficient home in the marketplace. The two are separate programs, however, FPL can easily design the BuildSmart program with Energy Star since both the basis of efficiency levels are performance oriented by Florida law—the state code compliance methodology is already easily tied to the national standard based upon the (HERS) methodology. The BuildSmart program's Gold Level is 30% more energy-efficient than Florida Code requires (currently surpassing the minimum energy-efficiency level of an Energy Star Home) and its Silver level at 20% is close to the current Energy Star level, why not have the home qualified for Energy Star. By labeling homes using different programs, based on different standards, FPL is confusing the customer; failing to set an appropriate (national) standard for energy efficiency; and have some BuildSmart homes fail the national test (label) for an energy efficient home; that of Energy Star. Florida would also be well served by a tie between Energy Star home and the Florida energy efficient home in order to maximize any federal tax credit that may be initiated; since the proposals for a new home tax credit are tied to the national label and national system of performance rating.

28. Why do you believe that approval of FPL's BuildSmart Program as designed will increase your electric rates?

It is very simple. FPL has filed for cost recovery from its ratepayers for the costs it incurs in providing the BuildSmart Program. The amount of this recovery is added uniformly to the base rate of the residential ratepayer; in essence, increasing the charge per kilowatt hour used. FPL has shown that the BuildSmart Program as designed by FPL passes the Rate Impact Measure ("RIM") test; that is, it provides benefits to FPL from "avoided costs" to cover the direct and indirect ("lost revenues") costs of the program. Therefore, FPL argues that the program would not increase the base rate for any ratepayer. However, the Commission has historically awarded cost recovery to FPL for its direct costs in addition to those benefits. Some would say creating a "windfall profit" to the extent of such recovery to FPL; but, all would admit that it increases the cost of a kilowatt hour (rate) to the consumer.

As residential ratepayers, their cost per kilowatt hour increases due to cost recovery of the direct program costs, although FPL has shown through its use of the RIM test that it has also received benefits that covers both the direct program costs and its lost revenues as a result of the program.

As a commercial ratepayer and competing business, I will lose business for the services I provide not only because of FPL's entry into the business of providing services that I believe to constitute a "de facto" rating and/or services that are part of its rating service offer, but also because FPL is subsidized and enabled to provide such services "free" based by its benefits gained and additionally its cost recovery granted. In fact, FPL "profits" by its "free" services in direct competition with me. Furthermore, FPL

does not need to provide these services in the competitive marketplace to retain customers. Its only provided reason to offer these "free" services is to increase its market share for these services in the private market to the detriment of the my business.

29. Why do you think that approval of FPL's BuildSmart Program as designed will grant undue and/or unreasonable preferences and or advantages to certain persons contrary to § 366.03, F.S.?

I believe that the program, with its proposed modifications, provides "free" services that are available in the competitive marketplace to builders who sign up for FPL's BuildSmart Program at a cost imposed upon every residential ratepayer. FPL gains a "subsidized" entry into an area of services that, heretofore, have been competitive in the private marketplace. The builders are granted an advantage in marketing their product (residential unit) as energy efficient (certified by the local utility) and in obtaining subsidized services. The customers of those builders are granted an undue and/or unreasonable preference and/or advantage by receiving the benefits of those services provided free and, in result, have lower bills for their electric energy usage that other residential homeowners and renters that have not had the advantage of the "free" services. In fact, the other residential customers pay a higher amount for their electric energy usage because they are subsidizing the cost of providing those "free" services.

30.. Why do you believe that FPL's program will further confuse the consumer on what is an "energy efficient" home?

I believe that removing independent raters will further place the onsite information provided builders and their ultimate customers, homeowners, into the hands of an information provider that has different interests. State and federal programs to

assure a fair, complete and understandable set of information to be provided the consumer will further be weakened. Certainly, FPL's adoption of a "new" labeling system does not add much clarification as to what constitutes an "energy efficient" home. It brings to mind an old advertisement by a member of the "mobile home industry" that their homes "met the most energy efficient standards established by law," in referring to the fact that their homes met the lowest minimum standards of the preempted federal standards set by HUD...a far cry from any type of significant energy efficiency as any mobile home owner paying his electric bill can attest.

31. Have you reviewed the materials provided by FPL in its initial response filed last week to Petitioner's First Set of Interrogatories and Request for Production of Documents?

I have had some opportunity to review and had the Table 4 in Exhibit I prepared to try and summarize some of the voluminous data contained in their response. I haven't had a chance to fully analyze but I believe the table provides some interesting insights and opens several lines of inquiry that I am pursuing.

32. Does this conclude your testimony?

Yes.

TABLE 1

BUILD SMART PROGRAM FINANCING (last three years and proposed 2005)

L BUILDSMART PROGRAM FIGURES FROM 2002-2004 DSM

TESTIMONY

ILDSMART											Program	% ratepa
ar	Homes	Total exp	Cost/ Home	Pay & Benefits	Supplies	O/S Services	Ads	Veh	Other	Revenue	Progr Cos	
5P	3,821	$1,238,542	$324	$875,958	$9,525	$228,334	$15,000	$6,887	$102,838	$0	100	
)4	2,318	$1,130,813	$488	$707,136	$668	$333,407	$12,802	$4,627	$72,173	$98,224	91	
)3	1,230	$726,046	$590	$503,876	$1,760	$100,982	$59,260	$4,341	$55,827	$132,050	82	
)2	1,475	$641,584	$435	$468,382	$10,114	$107,788	$8,390	$116	$46,794	$59,975	91	

TABLE 2
ALTERNATIVE 25%-FPL Marketing/Admin; 67%-incentive; 8% for Quality Control

CHARGE HOME RATING AT TARIFF W/ DUCT TESTING--$230/home

ERNATIVE			Marketing-Admin		Incentive				Tariff	Net	%
)POSAL			(25%)		(67%)		Q.C. (8%)		$230	ECCR	ratepayer
r	Homes	Total exp	Exp	Per home	Exp	Per home	Exp	Per home	for 1/2 homes	Cost Recovery	Program costs
5p	3,821	$1,238,542	$309,636	$81	$829,823	$217	$99,083	$26	$439,415	$799,127	65%

TABLE 3
ENERGY STAR FIGURES FOR FLORIDA FROM EPA

WEBSITE

	Bldrs rpting E* homes	Bldrs with no homes rpted	HOMES total program	HOMES last 12 mo.	% last 12	2003 New Starts*	% E*
FLORIDA	48	34	6244	2496	39.97%	156,852	1.59%
FPL	5	n/a	312	52	16.67%	74,240	0.07%
GRU	11	n/a	621	173	27.86%	1,536	11.26%
PEF	19	n/a	4152	1737	41.84%	21,959	7.91%
OTHER	13	n/a	1159	534	46.07%	59,117	0.90%

OTHER STATES

	Bldrs rpting E* homes	Bldrs with no homes rpted	HOMES total program	HOMES last 12 mo.	% last 12	2003 New Starts*	% E*
CALIFORNIA	101	71	40186	24281	60.42%	139,870	17.36%
TEXAS	150	124	75044	41636	55.48%	134,197	31.03%

OHIO	31	18	11110	6236	56.13%	42,703	14.60%
NEVADA	32	24	33018	16919	51.24%	33,090	51.13%
WISCONSIN	230	114	4058	2112	52.05%	28,744	7.35%
NEW YORK	197	130	3200	1763	55.09%	24,196	7.29%
NEW JERSEY	56	38	7740	4210	54.39%	22,163	19.00%
MASS	55	33	2251	1049	46.60%	13,037	8.05%
INDIANA	33	17	7375	3011	40.83%	12,601	23.89%
VERMONT	25	8	1114	356	31.96%	2,430	14.65%
RHODE ISL	9	8	536	201	37.50%	1,948	10.32%

*State new starts are taken from BCAP table;

allocation within Florida is using factor derived from reported residential customers by utility (PSC)

TABLE 4

#4, 8 & 13-BUILDSMART DATA

Level	2000	2001	2002	2003	2004	2005	TOTAL	(#8--SERVICE PERFORMED Code calc
Bronze #	212	335	286	325	317	276	1751	1751
Fees*	$40,280	$63,650	$54,340	$61,750	$60,230	$52,440	$332,690	
Silver	304	481	633	844	994	551	3807	3807
Fees*	$27,360	$43,290	$56,970	$75,960	$89,460	$49,590	$342,630	
Gold	189	387	384	498	722	309	2489	2489
Fees*	0	0	0	0	0	0	0	
Plus premium service surcharge*			n/r	n/r	n/r	n/r	$10,250	
*at minimum					Program	Revenue:	$685,570	8047
# Builders	225	284	222	155	148	76		

#12-BERS w/BuildSmart

# BERS	$ collected	If tariff was charged at min.
n/r		
n/r		
389	$289.56	$95,305

#6-BERS

Level	2000	2001	2002	2003	2004	2005		$ at min tariff
Class 1	38	108	80	92	80	15	413	$101,185
Class 2	1	1	0	0	0	0	2	$380
Class 3	1	2	0	0	0	0	3	$270
							418	$101,835

#9-BERS cost analysis

TOTAL $	Salaries	Dir X	Overhead	Marketing
$10,329	$5,371.08	$2,478.96	$2,375.67	$0.00
100%	52%	24%	23%	0%