

**Ruth Nettles**

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**From:** Stright, Lisa [Lisa.Stright@pgnmail.com]  
**Sent:** Tuesday, December 09, 2008 8:14 AM  
**To:** Filings@psc.state.fl.us  
**Subject:** \*Resubmission\* PEF's Post-Workshop Comments - Dkt# 080503  
**Importance:** High  
**Attachments:** Document.pdf

**RESUBMISSION**

**This electronic filing is made by:**

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**Docket No. 080503-EI**

**On behalf of Progress Energy Florida**

**Consisting of 2 pages.**

**The attached document for filing is PEF's  
Post-Workshop Comments to the 12/3/08 RPS  
Workshop pertaining to the Draft RPS Rule.**

*Lisa Stright*  
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*updated  
12/9/08  
RUB*



December 8, 2008

**VIA ELECTRONIC FILING**

Ms. Ann Cole, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

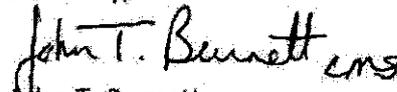
Re: Establishment of rule on renewable portfolio standard; Docket No. 080503-EI

Dear Ms. Cole:

Please find enclosed for filing on behalf of Progress Energy Florida, Inc. ("PEF") its Post-Workshop comments to the December 3, 2008 Workshop regarding the Draft RPS Rule.

Thank you for your assistance in this matter.

Sincerely,

  
John T. Burnett

Progress Energy Florida, Inc.  
105 E. College Avenue  
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Tallahassee, FL 32301

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**Progress Energy Florida, Inc.'s Post-Workshop Comments to the  
December 3, 2008 RPS Workshop  
Docket No. 080503-EI**

- PEF appreciates the ability to participate in this rule making process and recognizes the Florida Public Service Commission's efforts on this very important endeavor.
- PEF continues to support the FPSC's Staff RPS draft rule as revised on 10/2/08; and, PEF's red-lines that were submitted on September 5, 2008 as applicable.
- PEF believes the Staff's draft rule is based on renewable resource availability, technical capability and economic effectiveness. It has sufficient details to be an efficient and workable standard, where it meets the goals and enables legislation accordingly. It offers a balanced approach on encouraging the development of renewable technologies in Florida, while providing consumer protection.
- The Staff's proposed rule acknowledges realistic percentages which increase over time and can be adjusted going forward.
- The Staff's proposed rule provides a sound methodology for establishing a price cap while balancing the RPS goals with those of multiple stakeholders.
- The Staff's proposed rule provides for sufficient reviews and excusal provisions that work in tandem with a practical REC market and price caps, thereby safeguarding the ratepayer.
- PEF would again recommend provisions that will give way to federal laws. We recommend allowing revisions to the rule subject to greenhouse gas limitations.
- And finally, PEF believes the IOU penalty provisions are unnecessary given the Commission already has penalty authority over IOUs that are non-compliant to the F.A.C. in Florida.

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