

**Dorothy Menasco**

**From:** Keating, Beth [BKeating@gunster.com]  
**Sent:** Friday, September 30, 2011 10:59 AM  
**To:** Filings@psc.state.fl.us  
**Cc:** Larry Harris; 'Martin Cheryl'  
**Subject:** 110000-OT

**Attachments:** 20110930105403765.pdf

Attached for electronic filing, please find Florida Public Utilities Company's Responses to Staff's First Data Requests regarding the DSM Technical Potential Study. Please don't hesitate to contact me if you have any questions.

Beth Keating

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a. Person responsible for this electronic filing:

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b. Docket No. 110000-OT: Undocketed Filings for 2011

c. On behalf of: Florida Public Utilities Company

d. There are a total of 3 pages.

e. Description: FPUC's Responses to Staff's First Data Requests Regarding Technical Potential Study



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September 30, 2011

**ELECTRONIC FILING**  
**FILINGS@PSC.STATE.FL.US**

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

Re: Docket No. 110000-OT - Undocketed Filings - Demand Side Management Goals Technical Potential Study

Dear Ms. Cole:

Attached for electronic filing, please find a copy of FPUC's Responses to Staff's First Data Request regarding data for the Technical Potential Study used in the 2008 DSM goals setting proceeding.

Thank you for your assistance with this filing. If you have any questions, please do not hesitate to contact me.

Sincerely,

Beth Keating  
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MEK  
cc:/ Mr. Larry Harris (Senior Staff Counsel)

DOCUMENT NUMBER-DATE

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**FLORIDA PUBLIC UTILITIES COMPANY  
RESPONSES TO  
STAFF'S FIRST DATA REQUEST**

**DOCKET NO. 110000-OT -  
Demand Side Management Goals Technical Potential Study**

1. Section 366.82(3), Florida Statutes, requires that in any proceeding to develop goals for increasing conservation and demand-side renewable energy resources, as well as reducing the growth of energy consumption, the Commission shall evaluate the full technical potential of all available demand-side and supply-side conservation and efficiency measures. In the 2008 goals setting proceeding, Docket Nos. 080407-EG through 080413-EG, the seven FEECA utilities collaboratively produced a "Technical Potential Study" (Document No. 02226-09) through the consulting company ITRON. For any new goals setting proceeding:

a) If the Technical Potential Study, Document No. 02226-09, were to be updated, please estimate how long it would take to make the necessary updates. Please fully explain the basis for your estimate.

FPUC Response: FPUC's Technical Potential Study, Document No. 02226-09 was developed as part of a collaborative effort among the FEECA utilities by Itron. The study used a large number of sources of data to develop the technical potential. Because of its small size, many of these sources were not unique and specific to FPUC. Many of the sources came from work conducted by or for FPL or the other IOU's. The process of updating these many sources would be extensive and would require the agreement and participation of the other IOU's or other sources would need to be developed. The entire updating process would be very extensive unless agreement was reached to only update certain sources. Even if only a few of the sources were updated, the work of integrating the updated sources into the existing technical potential evaluations would be significant. Document No. 02226-09 took approximately 13 months from the issuance of the RFP to publication of the final report of FPUC's technical potential. Considering some improvement in schedule due to the previous work, it would not be unreasonable to expect that an update would take between 8 and 12 months depending upon the scope of the specific update.

**b) If a new Technical Potential Study were required, please estimate how long it would take to produce such a study. Please fully explain the basis for your estimate.**

FPUC Response: As with the above response, the process of conducting a new Technical Potential Study is extensive. The scope would be dependent upon the use of data from work conducted for the other IOU's. It is reasonable to assume that conducting a new technical potential study would take approximately 12 months to complete.

FPUC would also like to comment that a more significant issue than schedule is the burdensome cost upon FPUC's ratepayers. If FPUC were to conduct an update or new technical potential study of the scope and magnitude of Document No. 02226-09, the cost to FPUC's rate payers would be significant if done under a similar collaborative process as for the 2009 Goals and would be prohibitive if FPUC were to have to conduct the study themselves.