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Attorneys and Counselors

Writer's Direct Dial No.
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May 23, 2014

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Carlotta S. Stauffer, Director
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: *In re: Commission review of numeric conservation goals (JEA),*
Docket No. 130203-EM

Dear Ms. Stauffer:

Enclosed for filing on behalf of JEA in the above docket are the following:

- JEA's Motion For Leave to File Revised Testimony and Exhibits (original and seven copies); and
- Pre-filed Panel Testimony of **Richard J. Vento** and **Donald P. Wucker**, along with attached revised Exhibit Nos. __ [JEA-4R] and __ [JEA-6R] (original and fifteen copies).

By copy of this letter, the enclosed documents have been furnished to the parties on the attached certificate of service by electronic mail.

Please acknowledge receipt and filing of the above by stamping the enclosed extra copies of the motion and testimony and return them to me. If you have any questions concerning this filing, please contact me at 425-2359.

Thank you for your assistance in connection with this matter.

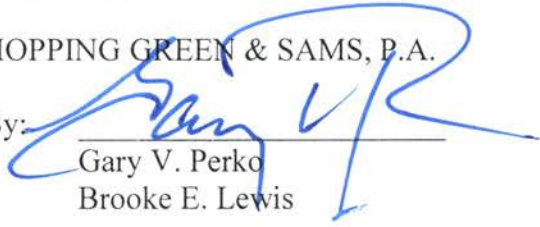
Testimony

COM 5
 AFD 1
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 ECO 1
 ENG 4
 GCL 2
 IDM 1
 TEL
 CLK 1-Court Reporter

GVP/mee
Enclosures

Very truly yours,

HOPPING GREEN & SAMS, P.A.

By: 
 Gary V. Perko
 Brooke E. Lewis

Attorneys for JEA

JEA's Motion

COM
 AFD 1
 APA
 ECO 1
 ENG 3
 GCL 1
 IDM 1
 TEL
 CLK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals (Florida Power & Light Company).

DOCKET NO. 130199-EI

In re: Commission review of numeric conservation goals (Duke Energy Florida, Inc.).

DOCKET NO. 130200-EI

In re: Commission review of numeric conservation goals (Tampa Electric Company).

DOCKET NO. 130201-EI

In re: Commission review of numeric conservation goals (Gulf Power Company).

DOCKET NO. 130202-EI

In re: Commission review of numeric conservation goals (JEA).

DOCKET NO. 130203-EM

Dated: May 23, 2014

**MOTION FOR LEAVE TO FILE REVISED
DIRECT TESTIMONY AND EXHIBITS**

JEA, pursuant to Rule 28-106.204, Florida Administrative Code (F.A.C.), hereby moves for leave to file the revised direct panel testimony of Richard J. Vento and Donald P. Wucker, along with revised Exhibit Nos. ___ (JEA-4R) and ___ (JEA-6R) proffered herewith. In support of its motion, JEA states:

1. On April 2, 2014, JEA submitted the pre-filed direct, panel testimony (and exhibits) of Richard J. Vento and Donald P. Wucker in accordance with the Order Consolidating Dockets and Establishing Procedure (Order No. PSC-13-0386-PCO-EU).

2. In preparing the responses to Staff's first set of interrogatories, JEA identified a potential error in the inputs used for LED lighting measures in the industrial sector. JEA and its contractor, Itron, investigated the issue and determined that indeed the per-unit savings for those measures had not been properly adjusted for interactions with CFLs and linear fluorescent

measures, which resulted in double-counting a substantial portion of the economic and achievable potential for LEDs. Itron then revised the per-unit savings for those LED measures and re-estimated technical, economic, and achievable potential for JEA's industrial sector following the exact same methodology and process described in the panel testimony that JEA submitted on April 2, 2014. The revised inputs for industrial LED measures results in a reduction in the total technical, economic, and achievable potential across all TRC, RIM, payback screen, and incentive scenarios, as shown in Attachment "A" hereto.

3. In addition, while revising the summary tables with the corrected industrial results, JEA and Itron identified a version control error that led to the incorrect reporting of TRC economic potential for the existing residential sector in the exhibits submitted on April 2, 2014. The correct values are reflected in the revisions included in Attachment "A" hereto. JEA and Itron verified that all other potential estimates for JEA's residential sector (technical and all achievable scenarios) that were previously submitted remain accurate and correct.

4. In order to provide the Commission with the most accurate information available, JEA proffers with this motion the revised panel testimony of Richard J. Vento and Donald P. Wucker, as well as Exhibit Nos. ___ (JEA-4R) and ___ (JEA-6R), which reflect the corrected values discussed above. Attachment "A" to this motion identifies all changes made to the testimony and exhibits.

5. In accordance with Rule 28-106.204(3), F.A.C., counsel for JEA has attempted to contact counsel for all of the parties in Docket No. 130203-EM, and is authorized to state that Commission Staff and Intervenor Sierra Club take no position on the motion. Undersigned counsel was unable to reach counsel for Intervenor Wal-Mart Stores East, LP and Sam's East, Inc. to determine their position on the motion.

WHEREFORE, JEA respectfully requests leave to file the revised direct, panel testimony of Richard J. Vento and Donald P. Wucker and revised Exhibit Nos. __ (JEA-4R) and __ (JEA-6R) proffered with this motion for inclusion in the record at the Commission's hearing in this proceeding.

RESPECTFULLY SUBMITTED this 23rd day of May, 2014.

HOPPING GREEN & SAMS, P.A.

/s/Gary V. Perko

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Attachment "A"
Revisions to JEA Testimony and Exhibits

Revisions to Pre-filed Testimony of Richard J. Vento and Donald P. Wucker

Page 18, lines 15-17:

- The ~~0.9~~ 0.1 MW (summer), ~~0.7~~ 0.1 MW (winter), and ~~6.3~~ 1.2 GWh (annual energy) values represent the sum of potential across 49 measures, resulting in an average potential of ~~0.13~~ 0.02 GWh and ~~0.18~~ 0.002 MW savings per measure."

Revisions to Exhibit No. __[JEA-4]:

	RIM Evaluation			TRC Evaluation		
	Summer MW	Winter MW	Annual GWh	Summer MW	Winter MW	Annual GWh
Economic Potential - Base Fuel						
Residential	0	0	0	47.3 <u>42.2</u>	12.7 <u>12.2</u>	209.1 <u>199.1</u>
Commercial/Industrial	11.8 <u>11.5</u>	7.4 <u>7.3</u>	85.1 <u>84.6</u>	58.2	16.0	278.3
Achievable Potential - Base Fuel						
Residential	0	0	0	14.0	2.8	49.8
Commercial/Industrial	0.9 <u>0.1</u>	0.7 <u>0.1</u>	6.3 <u>1.2</u>	10.1	2.5	50.9

Revisions to Exhibit No. __[JEA-6]:

	RIM Evaluation			TRC Evaluation		
	Summer MW	Winter MW	Annual GWh	Summer MW	Winter MW	Annual GWh
Economic Potential - High Fuel						
Residential	0	0	0	56.2 <u>651.76</u>	21.3 <u>620.59</u>	328.9 <u>8320.57</u>
Commercial/Industrial	11.6 <u>11.43</u>	7.3 <u>07.23</u>	84.2 <u>983.75</u>	64.1 <u>860.70</u>	19.0 <u>416.43</u>	313.5 <u>2290.23</u>
Economic Potential - Low Fuel						
Residential	0	0	0	30.2 <u>825.28</u>	6.8 <u>16.28</u>	136.7 <u>4126.85</u>
Commercial/Industrial	0	0	0	52.0 <u>246.88</u>	17.1 <u>213.05</u>	261.2 <u>7225.10</u>
Economic Potential - 1-Year Free-Ridership Exclusion						
Residential	0	0	0	79.9 <u>474.83</u>	52.7 <u>452.22</u>	398.6 <u>1388.57</u>
Commercial/Industrial	24.68	18.23	185.95	95.6 <u>590.51</u>	42.0 <u>037.94</u>	523.4 <u>7487.3</u>
Economic Potential - 3-Year Free-Ridership Exclusion						
Residential	0	0	0	12.7 <u>37.61</u>	7.2 <u>66.73</u>	65.2 <u>555.21</u>
Commercial/Industrial	11.3 <u>11.07</u>	7.0 <u>87.01</u>	81.1 <u>880.65</u>	43.91	12.62	195.86

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic delivery and U.S. Mail (*), this 23rd day of May, 2014, to the following:

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