

October 5, 2020

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Dear Chairman Clark and Commissioners Brown, Graham, Fay and Polmann:

Southern Alliance for Clean Energy thanks you for the opportunity to present information to you during the Customer-Owned Renewable Generation workshop on September 17, 2020. Today, we wish to provide additional supplementary information to the Commission. During our presentation, we made several references to the SACE *Solar in the Southeast* annual report. The link to the report is provided here for your convenience. <https://cleanenergy.org/wp-content/uploads/Solar-in-the-Southeast-Report-2020.pdf>

The compressed timeframe didn't allow for us to elaborate on Florida's renewable energy statute – and Commission Staff had already duly covered the basics. The point we wish to highlight here is that the five objectives (in bold) referenced by the Legislature remain as valid today as when it was enacted and that the Commission's net metering rule provides for meaningful rooftop solar development and is consistent with the statute.

The Legislature finds that it is in the public interest to promote the development of renewable energy resources in this state. Renewable energy resources have the potential to help **diversify fuel types** to meet Florida's growing dependency on natural gas for electric production, **minimize the volatility** of fuel costs, **encourage investment** within the state, **improve environmental conditions**, and **make Florida a leader** in new and innovative technologies. Section 366.91(1), Fla. Stat. (emphasis added)

We also wish to contribute on a few questions asked of other presenters. There were questions about the value of solar, in particular, when it doesn't coincide with load on the system and one about demand response programs to address winter peak

scenarios. In response, we wish to share a report we published earlier this year: *Seasonal Electricity Demand in the Southeast*. <https://cleanenergy.org/wp-content/uploads/Seasonal-Electric-Demand-in-SE-SACE-Final.pdf>

This report evaluated demand data for the twenty-year period, 1998-2018, and we would like to share with you **the vast majority of the peak hours for Florida utilities remain during summer months**. For the Florida investor-owned utilities: 94% of FPL peaks occurred in Summer, 92% for Gulf Power, 89% for Tampa Electric, and 82% for Duke Energy Florida.

There was also a question about the **demographics of solar customers**. We believe a reliable and recent resource would be an updated report Lawrence Berkeley National Lab (LBNL) published earlier this year (February 2020): *Income Trends among U.S. Residential Rooftop Solar Adopters* <https://emp.lbl.gov/publications/income-trends-among-us-residential>

That LBNL report illustrates that **solar is becoming more affordable for everyone**. We offer a few relevant excerpts:

- Income distribution of 2018 residential solar adopters:
 - 15% have household incomes <\$50k, 33% are between \$50-100k
- Solar adoption has been slowly migrating toward lower incomes
 - Sample share of HHs [households] with incomes <\$100k grew from 39% to 48% over 2010-2018, with most pronounced shift since 2014
 - While share of HHs with incomes ≥\$200k dropped from 26% to 16%

A couple items were strikingly clear before and during the workshop. Floridians are passionate about solar choice; the sheer number who took the time to submit comments bears that out. The penetration of net metered solar in Florida (less than 1% by various metrics outlined in our presentation) indicates that it would be premature to consider substantive changes to this critical and effective state policy. As we stated in the workshop, **“now’s not the time to fix something that’s not broken.”**

Additionally, given the Commission’s schedule, and matters it will consider in the near-term, we respectfully suggest that other matters are more deserving of the Commission’s attention. In particular, SACE filed a request in Docket No. 20200181 to hold a scoping workshop(s) to ensure that the amendment of the Commission’s conservation goal setting rule addresses the use of decades-old economic screening practices that depress the potential for energy savings in Florida. Energy efficiency and demand response are important regulatory tools that

can work in tandem with distributed solar systems to the benefit of customers and the utility's system. In order to realize the benefit of that clean energy building block, we must first modernize how we evaluate the cost-effectiveness of demand side measures and plans in Florida.

At the Ten-Year Site Plan review in August, SACE described Florida as an outlier on resource planning. The lack of transparency, stakeholder involvement, and resource competition has led to Florida's over-reliance on gas instead of turning to cleaner, less costly and risky resources. Comprehensive resource planning methods should reveal additional opportunities for more clean energy resources, fewer new fossil infrastructure investments, and improvements to customer rates, bills, and health.

We again thank you for the opportunity to present to you on net metering policy and reiterate interest to engage with you on not only solar policy, but on a more robust energy efficiency goals setting process and best practices in resource planning.

Sincerely,

Bryan Jacob
Solar Program Director
Southern Alliance for Clean Energy