

**Nickalus Holmes**

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**From:** Nickalus Holmes on behalf of Records Clerk  
**Sent:** Friday, June 27, 2025 12:57 PM  
**To:** 'Kim Bradford'  
**Cc:** Consumer Contact  
**Subject:** RE: Docket 20250011

Good afternoon

We will be placing your comments below in consumer correspondence in Docket No. 20250011, and forwarding your comments to the Office of Consumer Assistance and Outreach.

Thank you,

Nick Holmes  
Commission Deputy Clerk II  
Office of Commission Clerk  
Florida Public Service Commission  
850-413-6770

**From:** Kim Bradford <kim.bradford40@yahoo.com>  
**Sent:** Friday, June 27, 2025 12:55 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Docket 20250011

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Florida is seeing a non-diversified supply of new electric-generating capacity, to utility scale solar and battery storage, added from 2019-2025 by its regulated utilities. Ten-year site plans from the regulated utilities within SERC Florida project some 91% of 2025-2034 new capacity additions will be solar and battery storage (BESS). On an energy supply basis, this form of electrification supports Florida power generation only some 5.2 hrs. average hours per day per the NREL. Per The DOE Berkeley National Labs., the net accredited capacity factor of Florida Solar power is only 23%.

**Impact to Service:** Winter and summer peak reserve margins will likely suffer in Florida due to the part time and non-reliable nature of the power sources described. Winter reserve margins will decline by some 10% according to FP&L. The Docket assumes as well that existing constant-duty, base load power plants across Florida will be shuttered, adding great cost and a net reliability loss to consumers due to the part time and intermittent, non-dispatchable solar replacement power. Florida regulated utilities have already begun soliciting customers to reduce power demand during summer and winter peak periods (e.g. four thirty PM seven thirty PM for summer peak periods) and shift this demand to midnight to five AM. This impacts EV recharging that has been a popular

mode of transportation for many Floridians. Add to this the increased energy demands to run AI and the concerns increase exponentially.

**Impact to Costs:** The Energy basis Kwh installed cost of Florida solar power is 8.5X that of the advanced gas fired combined cycle power technology installed across Florida during the 2010-2019 period, and 4.25X as costly as present new combined cycle build cost estimates. The battery storage proposed within the ten-year site plans, required to back up just a portion of the intermittent solar power only 2-3 hrs. per day, costs 3.9X advanced combined cycle power. Building this kind of solar and BESS capacity has caused rates to rise dramatically in all markets where applied heavily (Western Europe, CA, Australia), along with interim supply shortages to the detriment of consumer ratepayers and industry alike. Alternate, cost effective, proven technology appears available to deploy here, given recent large awards to GE Vernova provided by Duke Energy (11 units), along with Nextera, targeting their hyperscaler and data center clients.

**Impact to Florida Landscape.** FP&L 74.5MW solar farms consume on average, 680 acres each across FP&L's filed ten-year site plan, aggregating some 192,000 acres. This same annual Kwh electrical capacity, on a combined cycle energy delivered basis, would consume only some 66 acres. As large quantities of utility scale solar farms are added within a given region, their incremental capacity factor declines markedly, by up to some 40% according to MISO and WECC studies.

**Impact to Energy Security.** The related equipment deployed and planned (thin film PV and processed lithium battery components) emanate from Chinese supply sources and Chinese sub-vendor countries. Fox News, Reuters, and other news agencies, along with a 2017 DOE Sandia lab evaluation, have reported the presence of controlling sensors embedded within solar panels, power transformers, and inverters of Chinese origin.

I urge you to please reject this extremely costly FP&L plan to continue to install a non-diversified supply of dominantly solar and BESS technology across Florida. The impacts to service, costs, our beautiful Florida farms and landscape, as well as energy security are not worth it.

Regards,

Kimberly Bradford  
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