

Ruth Nettles

From: Rosanne Gervasi
Sent: Monday, January 28, 2008 3:24 PM
To: Ruth Nettles
Subject: RE: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

thanks Ruth. I think the comments should be placed in the docket file rather than on the correspondence side though, since that's where the IOUs comments went and we will likely refer to both sets of comments in a forthcoming recommendation. Thanks.

From: Ruth Nettles
Sent: Monday, January 28, 2008 3:20 PM
To: Rosanne Gervasi
Subject: FW: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

This email was for you.

From: Ruth Nettles
Sent: Monday, January 28, 2008 3:19 PM
To: Ruth Nettles
Subject: RE: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

Roseanne, FYI, we accepted the comments filed by Mr. Steven Dan and placed them in the Consumer side of the docket file. See DN 00662-08 when scanned.

Also, this is what was sent to him from CLK:
 Mr. Dan,

We will be placing the comments below in the correspondence file for the Docket 070674. For future reference, please direct comments to clerk@psc.state.fl.us. If you file attached documents to be placed in a specific docket file, you may file them at filings@psc.state.fl.us. Please feel free to contact our office if you have any questions.

Dorothy Menasco
 FPSC
 Office of Commission Clerk
 850-413-6330

From: Ruth Nettles
Sent: Monday, January 28, 2008 9:52 AM
To: Rosanne Gervasi
Subject: RE: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

you're welcomed.

From: Rosanne Gervasi
Sent: Monday, January 28, 2008 9:52 AM
To: Ruth Nettles

1/28/2008

DOCUMENT NO. DATE
 00662-08 01/28/08
FPSC - COMMISSION CLERK

Subject: RE: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

thank you Ruth!

From: Ruth Nettles

Sent: Monday, January 28, 2008 9:52 AM

To: Rosanne Gervasi

Cc: Hong Wang; Kimberley Pena; Dorothy Menasco

Subject: RE: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

Roseanne, per our conversation, we did not receive any requests for hearing. The filing received at 5:13 p.m. from Steven Dan is titled public comment. Mr. Dan's e-mail for filing in the docket may need to be resubmitted. CLK staff will contact Mr. Dan to let him know of the requirements for electronic filings.

Ruth

From: Kimberley Pena

Sent: Monday, January 28, 2008 9:33 AM

To: Ruth Nettles

Subject: FW: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

Ruth, please confirm and respond to Rosanne. Please cc Hong. Thanks.

From: Hong Wang

Sent: Monday, January 28, 2008 9:31 AM

To: Kimberley Pena

Subject: FW: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

Kim, can you look into this, please?

Thanks!

From: Rosanne Gervasi

Sent: Monday, January 28, 2008 9:16 AM

To: Hong Wang

Subject: FW: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

Hong can you confirm the below for me? Thanks.

From: Lisa Scoles [mailto:lscoles@radeylaw.com]

Sent: Monday, January 28, 2008 7:57 AM

To: Rosanne Gervasi

Subject: RE: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

Just want to confirm - no hearing requests were received in the last few moments were they? I also assume that no comments were received except from the IOUs and Mr. Dan. Is that correct?

1/28/2008

Thanks,

Lisa Scoles

Radey Thomas Yon & Clark, P.A.

(850) 425-6662 direct line

(850) 425-6694 fax

Email: lscoles@radeylaw.com

From: Rosanne Gervasi [mailto:RGervasi@PSC.STATE.FL.US]

Sent: Friday, January 25, 2008 5:13 PM

To: Lisa Scoles

Subject: FW: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

Lisa, this is fyi. Rosanne

From: Steven Dan [mailto:steve@danconsulting.com]

Sent: Friday, January 25, 2008 4:45 PM

To: Cynthia Miller; Rosanne Gervasi

Subject: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

In reading the IOU's public comments, I felt compelled to add a comment to the public record.

With only 200 PV systems currently connected, the IOUs are concerned about the cost of an additional manual disconnect and claiming that number could top \$240,000 in cost shifting to the general body of consumers. The IOUs were said it is less preferable to pull the meter - and seemed to indicate that as their only option. That's NOT their only other option.

There are many other solutions such as meters with a key controlled mechanically latching disconnect switch built into it. If new PV customers were to use this kind of meter, no additional manual disconnect switch would be required and the only other additional cost that would be incurred by the general public would be the cost of sending out a service person to use their key to switch off the system. The additional switch is not necessary. I'm sure that if the IOUs were responsible for paying for and installing what they claim is a critical additional disconnect, their highly qualified engineers would reengineer the meter or meter box and the cost would come down to a very reasonable negligible amount.

As a former computer programmer who helped build part of FPL's meter reading COBOL program, I can agree that rebuilding the IOUs computer system to allow for year end reconciliation instead of monthly reconciliation could be a very significant undertaking. It would be my opinion that if the IOUs feel it would be easier for them to perform a monthly reconciliation instead of an annual one, I would think there would be no objection as reconciling in a more timely manner has to benefit ratepayers as well. It would seem to be in everyone's best interest to do it monthly. I think that part of the rule should be adopted to make things easier on the utilities who need to manage their IT infrastructure. I don't see any harm to any stake holders in agreeing to this.

Most importantly, regarding the RECs - I do not agree with the IOUs. One of our collective goals here is to create such a level of interest, investment and adoption in renewable energy that hundreds of thousands of people would install systems and we could reduce the need for some polluting power plants. So, if that's the goal (or something like that) then it would seem to me you should give the home or business owner every available incentive to really kick start this process. If people can see a financial as well as environmentally conscious incentive to do this, it will flourish. If it is marginal financially then considering the hassle factor of installing and maintaining these systems and getting them permitted and the worry about losing them in hurricanes, it'll never happen. Practically speaking, you need to make this a financial win for people to get them off their collective behinds to do something. So, no, I don't agree with the IOUs that the RECs do not provide any benefit to the other customers.

There's a national security argument for energy independence and as many people that can provide their own electricity, the better for our country. Other benefits are things like reducing the need for more polluting power plants because some of the power is being generated locally in each neighborhood using clean technologies. That also improves everyone's air quality, not just the solar producers. When we make the environment better, it's better for everyone. So there is a benefit to society that comes from producing clean power. That benefit comes at a cost - and that cost is called a RECs. If we over stimulate the market and get a huge number of people putting up solar systems because of this REC, then it seems we will have succeed in reducing our traditional power demand as well as increase some amount of energy independence which is one goal of these programs.

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The cynic would say that anytime the monopoly is wanting to cut down on the payments to others, it means they are trying to preserve their profits and monopoly control. They want the RECs but they are presumably already getting the power at the Avoided Cost - they're already going to be making money off of the investment of others when they resell the clean energy they were able to buy at the retail rate - saving them the cost of fuel to burn, they are making out quite well - too well. The RECs need to go to the people producing the power and not delayed so the IOUs get a chance to rewrite a rule more in their favor.

I had 2 other general comments - firstly, we still don't understand whether PV power producers are going to be regulated or not by the PSC - as the Supreme Court of Florida ruled, the PSC is allowed to interpret the statutes as it sees fit as they are the agency charged with regulating the industry. So, to say you cannot change policy that it would require the legislature, that doesn't seem to go along with the Court's decision in the PW Ventures case. Small system power producers shouldn't have to become a public utility just to install a small PV system on a rooftop on their premises and sell the power back to their own tenant.

Secondly, allowing producers to sell power back based on a per Kilowatt hour rate (and either setting that rate or saying it cannot be equal to or greater than the retail rate) would seem the most straight forward way to charge for power for businesses who want to install rooftop systems and sell to the building tenants. If possible please clearly state how power producers are to sell power to a tenant in a building.

Thank you.
Steven Dan

Steven Dan
Dan Consulting Services, Inc.
14707 S. Dixie Hwy.
Suite 207
Miami, FL 33176

cell: 305 302-7659
ofc: 305 238-3344
fax: 305 666-8333

email: steve@danconsulting.com

DOCUMENT NUMBER-DATE

Ruth Nettles

00662 JAN 28 g

From: Steven Dan [steve@danconsulting.com]**Sent:** Friday, January 25, 2008 5:13 PM**To:** Filings@psc.state.fl.us**Subject:** FW: public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

FPSC-COMMISSION CLERK

From: Steven Dan [mailto:steve@danconsulting.com]**Sent:** Friday, January 25, 2008 4:45 PM**To:** Cynthia Miller (cmiller@psc.state.fl); Rosanne Gervasi (rgervasi@psc.state.fl.us)**Subject:** public comment on docket # 070674-EI - Interconnection and Net Metering of Customer_Owned Renewable Generation

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s/Steven Dan

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