

Antonia Hover

From: Jeffrey Vredenburg <Jeffrey.Vredenburg@sarasotaFL.gov>
Sent: Tuesday, June 25, 2019 2:27 PM
To: Records Clerk
Cc: Stevie Freeman-Montes
Subject: Public Comment, City of Sarasota, for Docket 20190015 (Commission review of numeric conservation goals (Florida Power & Light Company))
Attachments: Docket 20190015 PSC.pdf

Good Afternoon,

Please see the attached docket reference # 20190015 which is a signed letter to the PSC in reference to the energy efficiency policies of utilities – specifically FPL.

Thank you for registering your email and posting the letter to the website. Can you please let me know when this is done?

Much appreciated,

Jeff Vredenburg

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June 14, 2019

Mr. Art Graham, Chairman
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399

Florida Energy and Conservation Act (FEECA) Comment Submittal for the General Comment Period of 2019.

Period Docket: 20190015

Dear Chairman Graham and Members of the Florida Public Service Commission,

The City of Sarasota respectfully requests that you and your colleagues challenge Florida Power and Light (FPL) and other Florida utility companies to increase their energy efficiency goals in the upcoming Florida Energy Efficiency and Conservation Act (FEECA) review. The Florida Public Service Commission ("PSC") establishes numeric energy conservation goals for Florida's largest utilities at least every five years, and the 2019 FEECA proceedings before the PSC present an opportunity for substantial improvement to Florida's energy conservation goals.

Energy Efficiency in Florida

Energy efficiency in Florida lags behind the majority of other states; it is second to last in national results and Florida's four major utility companies are all below the Southeast utility average. The City of Sarasota is requesting higher standards and stricter regulations be placed on utility companies.

Key to the idea of efficiency in Florida's utilities is understanding that this is not a utility issue, it is a standard issue. If the state of Florida does not enforce higher standards for utility companies, efficiency will not be addressed by the utility companies. Not only are Florida company's efficiency standards lower than other states, but as in the case of FPL, they have been continuing to lower their energy efficiency goals over the past few years.

City of Sarasota's Goals

In June of 2017, the City of Sarasota adopted a Ready for 100 Resolution, committing both the organization and the community to 100% renewable energy by 2030 and 2045, respectively. Recently, the

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City signed up for FPL's SolarTogether program which allows us to achieve part of this organizational goal and shows our strong commitment to renewable energy.

The City of Sarasota has been proud to partner with FPL on many previous projects that support these efforts. In our franchise agreement with FPL there is a Renewable Energy, Energy Efficiency and Energy Sustainability Agreement. This agreement includes education for FPL's customers that live in the city, energy audits for City facilities and private residences, installations of EV charging stations and LED streetlight installations, among other projects. We commend FPL's investment in renewables but know that this is the second step in inspiring a grid-wide change – a large scale investment in renewables is only as good as the efficiency of the systems that connect to it.

It is the City's hope that moving forward, in the true spirit of an authentic collaboration, FPL's energy goal's and plans would match their municipal customers, their businesses, their residential customers, and their community-based non-profit organizations as well as other community stakeholders rather than trailing behind. It is time for FPL as the current franchisee, to boldly prioritize its investment in energy efficiency in addition to its renewable energy investments. Higher standards and stricter regulations on energy efficiency placed on utility companies is a step in the right direction to accomplish this goal.

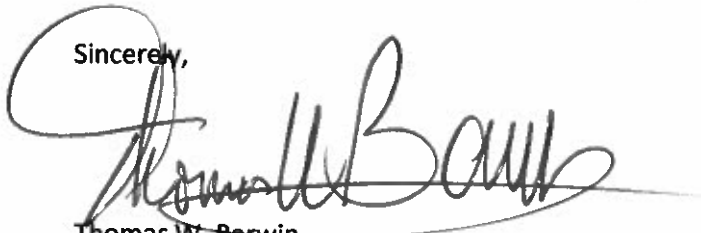
Moving Forward

With the Gulf of Mexico having risen 7 inches since 1945, and rising at a higher rate now, the City of Sarasota has set its course to be a leader in sustainability, energy conservation, environmental protection and stewardship. This means prioritizing energy conservation and efficiency programs and fostering an environment that encourages responsible energy use and education for residents, tourists and businesses that live, play and work in Sarasota.

The City knows that Florida utility companies can achieve these goals, and highly encourages the PSC to create and enforce higher energy efficiency standards for utility companies. One way that this could be done is doing away with the Ratepayer Impact (RIM) test. The RIM test is not a complete measure of efficiency and does not consider systemwide benefits of efficiency. By encouraging utilities to use another type of test that assesses energy efficiency holistically, Florida's utilities will join the other 49 states in better weighing energy efficiency measures. This will in turn inspire utility companies to transform their priorities towards sustainable practices and have the overall energy industry running on best management practices.

We thank you for your thoughtful consideration. If you need further information, please do not hesitate to contact me or the City's Sustainability Manager, Stevie Freeman-Montes, at (941) 926-6686.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas W. Barwin', written over a horizontal line.

Thomas W. Barwin
City Manager