

Brian Schultz

From: Brian Schultz on behalf of Records Clerk
Sent: Tuesday, August 13, 2019 5:04 PM
To: 'gknecht@TNC.ORG'
Cc: Consumer Contact
Subject: FW: Comments on FEECA proceeding
Attachments: FEECACommentLetter[1].pdf

Good Afternoon, Greg Knecht

We will be placing your comments below in consumer correspondence in Docket Nos. 20190015-20190021 and forwarding your comments to the Office of Consumer Assistance and Outreach.

Sincerely,

Brian Schultz

Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
Brian.Schultz@psc.state.fl.us
850.413.6770

PLEASE NOTE: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are considered to be public records and will be made available to the public and the media upon request. Therefore, your e-mail message may be subject to public disclosure.

From: Greg Knecht [<mailto:gknecht@TNC.ORG>]
Sent: Tuesday, August 13, 2019 4:50 PM
To: Records Clerk
Cc: Janet E. Bowman
Subject: Comments on FEECA proceeding

Please see attached.

Thank you

**Greg Knecht, Deputy
Executive Director**
gknecht@tnc.org
(850) 222-0199 X 101
(850) 566-4966 (Cell)

**The Nature
Conservancy, Florida**
820 E. Park Ave,
Building D100
Tallahassee, FL 32301



Join us! Connect with The Nature Conservancy in Florida on  [Facebook](#) and  [Twitter](#).

Mr. Adam J. Teitzman

Commission Clerk

Florida Public Service Commission

2540 Shumard Oak Boulevard

Tallahassee, Florida 32399

clerk@psc.state.fl.us

Re: Docket Numbers 20190015-EG, 20190016-EG, 20190017-EG, 20190018-EG, 20190019-EG,
20190020-EG, and 20190021-EG

Dear Clerk:

Please file the attached letter to the Public Service Commission in the dockets listed above.

Sincerely,

Greg Knecht

August 13, 2019

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

Dear Chairman Graham:

The purpose of this letter is to provide the comments of The Nature Conservancy in Florida on the proposed energy efficiency goals proposed by Duke Energy Florida, Florida Power & Light, Florida Public Utilities Company, Gulf Power Company, Jacksonville Electric Authority, Orlando Utilities Commission and Tampa Electric Company.

The Nature Conservancy is an international conservation organization that seeks, as one of its major conservation goals, the reduction of greenhouse gas emissions. The Nature Conservancy supports the efforts of local governments in Florida to adopt and implement renewable energy and energy conservation goals to reduce greenhouse gas emissions. We believe that utilities should accelerate their efforts to partner with these local governments to achieve renewable and energy efficiency goals.

The establishment of ambitious energy efficiency and conservation goals under the Florida Energy Efficiency and Conservation Act (FEECA) is critical to enabling consumers, businesses and local governments to reduce energy consumption. As Florida continues to feel the impacts of a changing climate, including increased temperatures, energy conservation programs will be particularly important to protecting the health of vulnerable populations, including the elderly and low-income residents who may live in older multi-family housing that does not meet current efficiency standards.

The goals proposed by the utilities participating in the 2019 FEECA proceeding are less ambitious than the goals adopted in 2014 and rely on the Rate Impact Measure Test (RIM) as the test for evaluating the cost-effectiveness of each respective utilities renewable energy goals. Instead, we suggest the Commission adopt an alternative economic impact test to the Rate Impact Test that is structured to also value non-energy benefits such as environmental impacts.

Mr. Art Graham, Chairman

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Moreover, the goals proposed by the Florida utilities are significantly below the goals established by similar utilities in the Southeast and throughout the nation. The Nature Conservancy believes that as the third largest state in the country with a growing economy, Florida should be a leader in establishing ambitious energy efficiency goals.

The Nature Conservancy appreciates the opportunity to submit comments as part of this FEECA proceeding. Should you have any questions, please contact Janet Bowman, (Janet.Bowman@TNC.ORG/850-222-0199).

Sincerely,

A handwritten signature in blue ink, appearing to read "G. Knecht", written in a cursive style.

Greg Knecht,
Deputy Executive Director