

**BEFORE THE PUBLIC SERVICE COMMISSION**

In re: Petition for approval of FPL  
SolarTogether program and tariff, by  
Florida Power & Light Company.

---

Docket No. 20190061-EI

DATED: January 3, 2020

**VOTE SOLAR'S  
PREHEARING STATEMENT**

**A. APPEARANCES:**

Marsha E. Rule  
Rutledge Ecenia, P.A.  
Fla. Bar No. 0302066  
119 South Monroe Street, Suite 202  
Tallahassee, Florida 32301  
marsha@rutledge-ecenia.com  
Phone: 850.681.6788

Richard A. Zambo  
Richard A. Zambo, P.A.  
Fla. Bar No. 312525  
2336 S.E. Ocean Boulevard, #309  
Stuart, Florida 34966  
richzambo@aol.com  
Phone: 772.225.5400

*Attorneys for Vote Solar*

Katie Chiles Ottenweller  
Southeast Director  
Vote Solar  
151 Estoria Street SE  
Atlanta, GA 30316  
katie@votesolar.org  
Phone: 706.224.8017

*Qualified Representative for Vote Solar*

**B. WITNESSES:**

<b>Witness</b>	<b>Subject Matter</b>	<b>Issue #</b>
<b>Direct</b> Matt Cox	Assessment of the strengths and shortcomings of the SolarTogether program as proposed and suggestion of improvements to the design of the program for all customers, with a focus on low income customer access and value proposition.	2,3,4

**C. EXHIBITS:**

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit No.</b>	<b>Description</b>	<b>Issue #</b>
<b>Direct</b> Matt Cox	Vote Solar	MC-1 MC-2	Resume of Matt Cox, PhD Map of Customer Electricity Burdens in FPL's Service Territory	2,3,4

**D. STATEMENT OF BASIC POSITION:**

**Vote Solar's Statement of Basic Position:**

Vote Solar supports the SolarTogether program and tariff as amended by the stipulation entered into by Florida Power & Light, Southern Alliance for Clean Energy, Walmart and Vote Solar as a reasonable resolution of the issues raised by this filing. According to FPL, the SolarTogether program and tariff as amended by the stipulation will provide an estimated \$249 million dollars in economic benefits, will diversify Florida's energy mix with clean, fuel-free electricity, and will provide a much-needed option for customers seeking more access to solar power.

Importantly, this program, if approved, will constitute the largest voluntary utility-sponsored low-income solar offering in the country, which will help address the

severe energy burdens borne by low income ratepayers in Florida. For all these reasons, Vote Solar asks the Commission to approve the SolarTogether program and tariff as amended by the stipulation.

E. STATEMENT OF ISSUES AND POSITIONS

ISSUE 1: Is FPL’s proposed SolarTogether Rider tariff an appropriate mechanism to seek approval for the construction of 1,490 MW of new solar generation facilities?

VOTE SOLAR: No position.

ISSUE 2: Does FPL’s proposed SolarTogether Rider tariff give any undue or unreasonable preference or advantage to any person or locality or subject the same to any undue or unreasonable prejudice or disadvantage in any respect, contrary to Section 366.03, Florida Statutes?

VOTE SOLAR: No. As amended, the SolarTogether Rider tariff strikes a fair and reasonable balance in the allocation of the program’s costs and benefits between the general body of customers, non-subscribing customers, and subscribing customers (those who are low-income and non-low-income), in consideration of the unique needs and interests of each.

ISSUE 3: Should the Commission allow recovery of all costs and expenses associated with FPL’s proposed SolarTogether Program in the manner proposed by FPL?

VOTE SOLAR: Yes.

ISSUE 4: Should the Commission approve FPL’s proposed SolarTogether Program and associated tariff, Rate Schedule STR, which is the same tariff attached as Attachment I to the Settlement Agreement filed October 9, 2019?

VOTE SOLAR: Yes. The Commission should approve the tariff attached as Attachment I to the Settlement Agreement filed October 9, 2019.

ISSUE 5: What adjustments, if any, should the Commission make to any affiliate transaction costs associated with FPL’s Solar Together Rider tariff?

VOTE SOLAR: No position.

ISSUE 6: Should this docket be closed?

VOTE SOLAR: Yes. Docket No. 20190061-EI should be closed once the Commission's decisions on all of the issues have become final and the Commission has concluded that the docket has otherwise met the requirements for closure.

CONTESTED ISSUES:

OPC ISSUE A: Is FPL required to demonstrate a need for the solar generation facilities that will be constructed for SolarTogether and, if so, what need or needs are met by the SolarTogether Program?

VOTE SOLAR: Vote Solar takes no position on whether this question should be included, or on whether FPL is required to demonstrate a need for these solar generation facilities.

If this question is included, Vote Solar takes the position that FPL has demonstrated a need for the solar generation facilities that will be constructed for SolarTogether. Customer demand for clean energy is a real and immediate need in order for utilities to continue to provide sufficient electric service that meets the needs of customers. Further, there is a public interest need for additional capacity that lowers costs for customers, especially those that suffer from high energy burdens. Lastly, these solar resources will further diversify FPL's electric system and mitigate the fuel volatility risks to customers due to reliance on natural gas.

F. STIPULATED ISSUES:

Vote Solar: FPL, SACE, Walmart and Vote Solar entered into a Stipulation and Settlement Agreement for which approval was sought by their Joint Motion to Approve Settlement filed on October 9, 2019.

G. MOTIONS:

Vote Solar: The Commission should grant the Joint Motion to Approve Settlement filed by FPL, SACE, Walmart and Vote Solar on October 9, 2019.

H. PENDING REQUEST OR CLAIMS FOR CONFIDENTIALITY:

Vote Solar: None at this time.

I. OBJECTIONS TO A WITNESS'S QUALIFICATION AS AN EXPERT:

Vote Solar: None at this time.

J. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

Vote Solar: Vote Solar complied with all requirements in the Order Establishing Procedure.

DATED this 3rd day of January 2020.

Respectfully submitted,

/s/ Marsha E. Rule  
Richard A. Zambo  
Richard A. Zambo, P.A.  
Fla. Bar No. 312525  
2336 S.E. Ocean Boulevard, #309  
Stuart, Florida 34966  
richzambo@aol.com  
Phone: 772.225.5400

Marsha E. Rule  
Rutledge Ecenia, P.A.  
Fla. Bar No. 0302066  
119 South Monroe Street, Suite 202  
Tallahassee, Florida 32301  
marsha@rutledge-ecenia.com  
Phone: 850.681.6788

*Attorneys for Vote Solar*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of Vote Solar's Prehearing Statement has been served by electronic mail to the following on January 3, 2020:

Kenneth A. Hoffman  
Florida Power & Light Company  
134 W. Jefferson Street  
Tallahassee, FL 32301  
[Ken.hoffman@fpl.com](mailto:Ken.hoffman@fpl.com)

Maria Jose Moncada  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
[Maria.moncada@fpl.com](mailto:Maria.moncada@fpl.com)

J. R. Kelly  
Stephanie A. Morse  
Office of Public Counsel  
c/o The Florida Legislature  
111 W Madison Street, Room 812  
Tallahassee, FL 32399  
[Kelly.jr@leg.state.fl.us](mailto:Kelly.jr@leg.state.fl.us)  
[Morse.stephanie@leg.state.fl.us](mailto:Morse.stephanie@leg.state.fl.us)

Walter Trierweiler  
Kristen Simmons  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[wtrierwe@psc.state.fl.us](mailto:wtrierwe@psc.state.fl.us)  
[ksimmons@psc.state.fl.us](mailto:ksimmons@psc.state.fl.us)

Jon C. Moyle, Jr.  
Karen A. Putnal  
Ian E. Waldick  
Florida Industrial Power Users Group  
Moyle Law Firm, PA  
118 N Gadsden Street  
Tallahassee, FL 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)  
[iwaldick@moylelaw.com](mailto:iwaldick@moylelaw.com)

George Cavros  
Southern Alliance for Clean Energy  
120 E. Oakland Park Blvd., Suite 105  
Fort Lauderdale, FL 33334  
[george@cavros-law.com](mailto:george@cavros-law.com)

Stephanie U. Eaton  
Carrie Harris Grundmann  
SPILMAN THOMAS & BATTLE, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
[seaton@spilmanlaw.com](mailto:seaton@spilmanlaw.com)  
[cgrundmann@spilmanlaw.com](mailto:cgrundmann@spilmanlaw.com)

Derrick Price Williamson  
SPILMAN THOMAS & BATTLE, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)

*/s/ Marsha E. Rule*  
\_\_\_\_\_  
Marsha E. Rule  
Attorney