

**Antonia Hover**

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**From:** Antonia Hover on behalf of Records Clerk  
**Sent:** Monday, August 17, 2020 2:06 PM  
**To:** 'meg@southeastcdn.org'  
**Cc:** Consumer Contact  
**Subject:** FW: Comments: Commission Review of 2020 Electric Utility Ten Year Site Plans  
**Attachments:** SSDN Comment Letter on TYSPs .pdf

Good Afternoon, Ms. Jamison.

We will be placing your comments below in consumer correspondence in Docket No. 20200000, and forwarding them to the Office of Consumer Assistance and Outreach.

Thank you.

*Toni Hover*  
Commission Deputy Clerk I  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399  
Phone: (850) 413-6467

**From:** Meg Jamison <meg@southeastcdn.org>  
**Sent:** Sunday, August 16, 2020 8:15 AM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Comments: Commission Review of 2020 Electric Utility Ten Year Site Plans

Greetings Mr. Chairman,

Please find comments attached to this message regarding the Commission's review of 2020 Utility Ten Year Site Plans.

Thanks!  
Meg

**Meg Williams Jamison**  
Network Director | Southeast Sustainability Directors Network (SSDN)  
[www.southeastcdn.org](http://www.southeastcdn.org) | Follow us! @theSSDN  
[2020 Roddenberry Fellow](#)

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August 17, 2020

Chairman Gary F. Clark  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

Re: Commission Review of 2020 Electric Utility Ten Year Site Plans

Dear Chairman and Members of the Florida Public Service Commission:

Thank you for the opportunity to provide these comments on the Commission's review of the 2020 electric utility Ten Year Site Plans (TYSPs).

The Southeast Sustainability Directors Network (SSDN) is a network of local governments in the southeastern United States that works together to advance sustainability initiatives in the region. As part of this work, SSDN supports the efforts of more than 40 local Florida governments to:

- Mitigate the environmental, economic, and public health impacts of climate change;
- Build a healthy, sustainable future with more opportunities for economic growth;
- Reduce pollution and improve Florida's air and water quality;
- Protect public health and safety, especially of Florida's most vulnerable citizens; and
- Meet ambitious climate goals.

As you conduct your review this year of the 2020 electric utility TYSPs, I write to share information with you about the energy decision-making trends of Florida's local governments. I hope this information provides you with helpful insights about the interests and needs of some of the state's largest energy consumers and their constituents.

Increasingly, local governments in the southeast and in Florida are establishing long-term sustainability goals and advancing sustainability initiatives in order to reduce emissions, scale investment in clean energy, create economic opportunities and jobs, and deliver immediate public health benefits to their residents and businesses. The development and adoption of these goals and initiatives is typically informed by public hearings and workshops, direct engagement with local stakeholders, and inventories and assessments that identify the opportunities, strategies, and pathways to achieve more sustainable outcomes.

Goals commonly adopted by local governments include:

1. Greenhouse gas (GHG) emissions reduction targets for a city or county's operations;
2. GHG emissions reduction targets for a city or county's entire community;<sup>1</sup> and
3. Renewable energy goals.

For instance, many local jurisdictions are adopting goals to achieve:

- Carbon neutrality or a specified level of GHG emissions reduction for their community or city operations by a target date (e.g. 30% GHG emissions reduction by 2030); and
- 100% renewable energy for their community or city operations by a target date (e.g. to power 100% of city operations with renewable energy by 2050).

Additionally, many municipalities are establishing GHG inventories to measure and report the emissions of their entire communities and/or their local government operations; are increasingly adopting social equity goals, or establishing offices of equity and inclusion, as part of their sustainability platforms in order to address the needs of frontline community members; and are increasingly leveraging their sustainability initiatives to build community resilience to disasters (e.g. via climate vulnerability assessments and resilience plans).

Notably, SSDN conducts an annual survey of its members to track the adoption rate of these goals and initiatives.<sup>2</sup> The results of our 2019 survey reveal that an overwhelming majority of our local government members have adopted GHG mitigation targets and are measuring and reporting their GHG emissions. Indeed:

- 62% of SSDN members have adopted a GHG mitigation target for their city or county operations;
- 40% of SSDN members have adopted a GHG mitigation target for their community;
- 73% of SSDN members are measuring and reporting GHG emissions for their city or county operations; and
- 45% of SSDN members are measuring and reporting GHG emissions for their community.

In order to deliver upon these goals, local governments are prioritizing numerous strategies, including the following efforts:

- They promote energy efficiency within their communities including in residences, multifamily buildings, and commercial spaces;

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<sup>1</sup> A "community" goal is for the community as a whole and could include a jurisdiction's residential, transportation, and commercial sectors, etc. as defined by the local government.

<sup>2</sup> In any one year, Florida cities and counties represent between 40%-50% of SSDN's membership

- They install solar arrays where land and roof space allows and strive to implement energy efficiency first in their own operations in order to reduce the upfront cost of renewable energy implementation;
- They support programs that expand access to renewable energy, including community solar offerings; and
- They work to support the adoption of electrified transport in their communities and in their own fleets.

Despite these robust efforts, local governments are often constrained in how much they can do to drive down their total GHG emissions footprint since they have little to no direct ability as customers to choose the sources of energy that power Florida's electricity grid. As such, cities and counties have a keen interest in finding ways to systematically improve the overall emissions performance of the grid's generation portfolio.

SSDN members are aware of the fact that this issue is typically examined in other states through a robust integrated resource planning process. In general a robust integrated resource planning process is a useful tool for local governments and other stakeholders to engage with their utility regulators and service providers to gain insights into the long-term plans for the electricity system; understand the key environmental, social, reliability, cost, and risk factors that shape decision-making; identify opportunities to achieve lower overall system costs; leverage relevant partnership opportunities; and foster dialogue. While such a process does not currently exist in Florida, SSDN and its members are interested in the TYSPs as a means to work towards better generation planning decisions that reflect the energy preferences of Florida's local communities.

Thank you for your consideration of my comments. I welcome the opportunity to share more information with you including the results of our 2020 local government survey when it becomes available later this fall, which will include data on additional local governments who have set aggressive carbon reduction goals in the past 12 months.

Please do not hesitate to contact me at 423-416-0839 with any questions.

Respectfully,

Meg Jamison  
Director  
Southeast Sustainability Directors Network  
[meg@southeastsdn.org](mailto:meg@southeastsdn.org)