

Hong Wang

From: Office of Commissioner Brown
Sent: Wednesday, August 26, 2020 3:52 PM
To: Commissioner Correspondence
Subject: FW: Solar Tier 2 insurance requirements

Hello,

Please place the email below in Docket No. 20200000.

Thank you,

Jennifer Brownfield
Executive Assistant to Commissioner Julie I. Brown
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
(850) 413-6030

From: t_tate@ttate.us [mailto:t_tate@ttate.us]
Sent: Wednesday, August 26, 2020 11:37 AM
To: Office of Commissioner Brown
Subject: Solar Tier 2 insurance requirements

Dear Commissioner Brown,

I would like to propose that the PSC discuss a measure to insert a customer-owned PV generation tier between Tier I and Tier II covering the range 10kW to 25kW and set a \$400,000 liability insurance cap on IOU requirements for interconnection for this new tier.

The PSC Order that chose these tier sizes remains unaltered from 2008, when residential systems larger than 10kW were cost-prohibitive, but today they are common and likely to become the norm for electric vehicle owners. The current order states that the risk to the IOU from a 9.9kW system is \$1 million less than the risk from a 10.1kW system, and more absurdly, it states that the risk from a 100kW system is the same as the risk from a 10kW system. The tiers are too wide and the jump from zero to \$1m is too high. Inverter technology has advanced by 12 years, with direct influence from NEC 2014, NEC 2017 and UL1741.

In my search of the web as I prepare to pay for a \$1 million insurance policy that SECO Energy is allowed to require for a Tier II system, I came numerous posts by others also dealing with the burden of this requirement.

I am unable to directly purchase a \$1 million in liability insurance on my homeowners policy from my insurer, American Integrity, they only offer up to \$400,000. I will be forced to increase my auto liability to \$ 1 million and buy a separate standalone umbrella policy for over \$250. If I add an umbrella over my policy. So the total annual cost for that and the umbrella is over \$650.

This is not about my personal finances or conclusions we could draw about residents who can afford more than 10kW solar. It's about the neighbors who can afford the 20-year solar loan payment because it's the same as their electric bill and who want to do their part to make air cleaner and water less toxic for their children and fellow Floridan's. I would be interested to know how many solar homeowners had to utilize their required liability policy, if ever.

Thank you for your time.