

August 27, 2020

Subject: Docket No. 20200181

Dear Chairman Clark, Commissioners Brown, Polmann, Fay, and Graham

I am a local ecologist in Port Charlotte concerned with Utility Efficiency and Energy Conservation.

The Southern Alliance for Clean Energy (SACE) has alerted the public you will be revising the state's energy efficiency rules. This is important because Florida stinks (sorry I don't know how else to say it) when it comes to electric utility efficiency and energy conservation. This poor performance translates to lost customer energy savings and lost opportunity in the fight to reverse global warming. Programs such as energy audits enable us to find out how to use energy more efficiently, how to conserve it, and yes, how to save lots of money. An energy audit can prove the difference between being able to afford a home and not being able to own a home – I know this from personal experience.

The American Council for an Energy-Efficient Economy (ACEEE) scores Florida 2 on a 20-point scale in the utility area. The main causes for the low score are below average funding for efficiency programs and low levels of savings. SACE says that one reason that Florida's big power companies are among the worst when it comes to helping customers save money is that you use badly outdated practices to subvert and undermine energy savings from Florida's Energy Efficiency and Conservation Act (FEECA). Last fall, Florida utilities attempted to cut their energy efficiency savings goals to zero (no kidding, zero!) using economic evaluation practices that are so old, no other state in the country uses them.

The problem goes deeper than just updating economic evaluation methods. According to the National Resources Defense Council, the big problem in Florida is the utility company's business model, which is based on earning a profit by the selling of more and more electricity. This conflicts with the goal of conservation - which is what we need to save money and reverse global warming. The current growth model creates a disincentive for investment in energy efficiency, conservations measures, distributed generation (roof top solar), and other possibilities that could reduce consumers' use of energy and their bills. What is needed most is for you to cause the utilities to change their business models to earn a profit from providing service, reducing energy demand and eliminating the carbon emissions that cause climate change (instead of profiting from selling more electricity).

Conservation and efficiency are important to reverse global warming and save customers' money. Fixing Florida's abysmal performance in this area should be your highest priority. In my view you must reform the cost-effectiveness and screening practices that previously led utilities to propose goals of zero. But most important you must implement the real solution: change the utility business model from one that profits from selling more electricity to one that profits by meeting customers' service needs and our energy and greenhouse gas reduction goals.

In the public's interest,

Coty Keller

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