

Jacob Ve Vaughn

From: Office of Commissioner Polmann
Sent: Thursday, August 27, 2020 12:29 PM
To: Commissioner Correspondence
Subject: FW: LULAC and ECOSWF Comments Requesting Scoping Workshop for Docket No 20200181
Attachments: Scoping Workshop Request.pdf

Good afternoon,

Please place the email below and attachment in docket 20200181-EU.

Thank you,

Cristina Slaton
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From: Bradley Marshall [<mailto:bmarshall@earthjustice.org>]
Sent: Thursday, August 27, 2020 9:14 AM
To: Records Clerk
Cc: Office of Commissioner Polmann; Office of Chairman Clark; Office of Commissioner Graham; Office of Commissioner Brown; Office of Commissioner Fay
Subject: LULAC and ECOSWF Comments Requesting Scoping Workshop for Docket No 20200181

Good morning,

Please find attached the Florida League of United Latin American Citizens' (LULAC) and the Environmental Confederation of Southwest Florida's (ECOSWF) joint comments in support of scoping workshops for Docket No. 20200181-EU. Please add these comments to the docket as LULAC's and ECOSWF's public comment. Please add LULAC and ECOSWF as interested persons, and please e-mail all notifications to bmarshall@earthjustice.org. If you have any questions, please do not hesitate to ask. Thank you.

Best,
Bradley

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed amendment of Rule 25-) DOCKET NO. 202000181-EU
17.0021, F.A.C., Goals for Electric)
Utilities)
_____)

**COMMENTS BY FLORIDA LEAGUE OF UNITED LATIN AMERICAN CITIZENS &
ENVIRONMENTAL CONFEDERATION OF SOUTHWEST FLORIDA
IN SUPPORT OF SCOPING WORKSHOP(S)**

The Florida League of United Latin American Citizens (“LULAC”) and the Environmental Confederation of Southwest Florida (“ECOSWF”) file these comments in support of the Southern Alliance for Clean Energy’s (“SACE”) request for the Florida Public Service Commission to hold one or more scoping workshops regarding Rule 25-17.0021, F.A.C.

It is well established that energy efficiency is the cheapest, quickest and cleanest way to meet electricity demand. The economic benefits of energy efficiency programs not only accrue system-wide through savings, such as reduced fuel, but also to individual families through cutting energy waste and driving down power bills. There are many hard-working Florida families that pay a disproportionately higher share of their income on power bills; referred to as energy burden. No family should have to make the choice between paying a power bill or paying for essential items like food or medicine. The economic fallout from the COVID-19 pandemic has only exacerbated the energy burden on low-income customers. Energy efficiency programs, particularly low-income programs, are an important tool in reducing energy burden.

The very idea of energy efficiency is to help customers cut energy waste. The Florida League of United Latin American Citizens (“LULAC”) has an elevated interest in evaluating energy efficiency and conservation measures that will affect the economic interests of its members. These sorts of measures can greatly reduce costs related to fuel consumption and

energy generation, costs that increase the energy burden of the utilities' customers and are found to be disproportionately high in Hispanic communities. Reducing these costs reduces the high energy burdens on the Hispanic community, implicating LULAC's interest in the economic condition of its members the Hispanic population of Florida. LULAC's members submitted sworn testimony as comments as part of the energy efficiency goal-setting process.¹ These comments made clear that the energy burden facing LULAC's members is real, and energy efficiency can be one of the most-effective ways to reduce that burden.

The Environmental Confederation of Southwest Florida ("ECOSWF") has over 100 members consisting of business entities, other organizations, and individuals living in southwest Florida. ECOSWF was organized for the purpose of conserving the natural resources of southwest Florida, implement energy efficiency improvements and alternatives, and to engage in actions in the furtherance of energy conservation and alternative energy source development.

The Energy Efficiency Act specifically calls for increasing the "efficiency of energy consumption," § 366.82(2), Fla. Stat., which plainly means helping customers reduce energy waste and save money on bills. The very idea of energy efficiency is to help customers cut energy waste. Robust programs will grant all customers the opportunity to voluntarily participate in efficiency programs and to decide whether to reduce their own electricity consumption and corresponding utility bills. All the while, savings from these programs will defer additional fossil fuel powered generation, reduce energy waste, and help to mitigate Florida utilities' misguided and dangerous overdependence on gas, which are the aims and objectives of the Energy Efficiency Act. Ultimately, this reluctance to help decrease energy usage will further exacerbate the costs to ratepayers of unpredicted fuel price shocks.

¹ <http://www.psc.state.fl.us/library/filings/2019/08186-2019/08186-2019.pdf>

Robust energy efficiency programs are important to LULAC's and ECOSWF's members, yet Florida continues to lag the nation in energy efficiency achievements. Any rulemaking that the Commission undertakes needs to take a comprehensive look at the entire process that leads to such underwhelming goals and achievements, including the cost-effectiveness tests used by the utilities to set the goals and steps that are used to screen out some of the most cost-effective energy efficiency measures. As this process operates now, one utility can screen out a measure because it is so cost-effective that it is assumed that people should adopt the measure on their own—even for families with limited income who lack the upfront capital to ever do so—while another utility screens out that same measure for being too costly due to the high administrative costs supposedly involved. Any energy efficiency process that can be manipulated this way is dysfunctional, irrational, and in need of serious reform. Therefore, LULAC and ECOSWF join SACE's request for one or more scoping workshops prior to Commission Staff promulgating draft rule amendments. Such workshop(s) and subsequent rulemaking should address the cost-benefit tests used in setting the goals; how free-ridership should be considered in the goal-setting and program design process, if at all; what assumptions the utilities should be allowed to use in the goal-setting process and which should be eliminated as inappropriate (for example, administrative costs cause many measures to not be "cost-effective" during the goal-setting process which then turn out to be cost-effective during the program design phase when realistic administrative costs are used); and what focus should be given to specifically address the energy burden for low-income families.

Respectfully submitted this 27th day of August, 2020.

/s/ Bradley Marshall
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