

Antonia Hover

From: Hannah Barker
Sent: Thursday, September 3, 2020 10:28 AM
To: Commissioner Correspondence
Subject: Docket Correspondence
Attachments: SG33-KM_45820090310170.pdf

Good morning,

Please place the attached letter in Docket No. 20200176. Thank you!

Hannah E. Barker
Executive Assistant to Chairman Clark
Florida Public Service Commission
[2540 Shumard Oak Blvd.](#)
[Tallahassee, FL 32399](#)
(850) 413-6004



OFFICE OF THE MAYOR

CITY OF ST. PETERSBURG

RICK KRISEMAN, MAYOR

August 13, 2020

Gary F. Clark, Chairman
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
contact@psc.state.fl.us

Re: Docket No. 20200176 – Petition to Approve Duke Energy’s Clean Energy Connection Program

Dear Chairman and Members of the Florida Public Service Commission:

Thank you for the opportunity to provide these comments on Duke Energy Florida’s Clean Energy Connection (CEC) program.

In 2019, the City of St. Petersburg adopted its first [Integrated Sustainability Action Plan \(ISAP\)](#). The ISAP is an ambitious plan that outlines the City’s current and future sustainability and resiliency initiatives. Notably, the Plan includes the City’s first ever greenhouse gas (GHG) emissions inventory and a roadmap that describes how St. Petersburg will achieve 100% renewable energy by 2035 and reduce its GHG emissions by 80% by 2050. The Clean Energy Connection program (CEC), as proposed by Duke Energy Florida (DEF), represents an opportunity to help facilitate the city achieving some aspects of these goals.

Extensive public engagement conducted as part of the ISAP development had several relevant common themes of the need for solution to address climate & energy, resiliency, and equity, specifically racial inequity was highlighted. St. Petersburg adopted the ISAP and other policies in order to:

- Mitigate the environmental, economic and public health impacts of climate change;
- Improve our air and water quality;
- Build a healthy, sustainable, and more resilient future;
- Strengthen our economy and support more local jobs; and
- Protect public health, particularly of our most vulnerable community members.

St. Petersburg is not alone in its efforts to provide solutions related to climate change mitigation and resiliency. In 2018, the City of St. Petersburg became a member of the newly formed [Tampa Bay Regional Resiliency Coalition](#). This coalition was formed to coordinate climate adaptation and mitigation activities across county lines including addressing the cause and effects of climate change.

Forming this coalition along with the [East Central Florida Regional Resiliency Collaborative](#) and the [Southeast Florida Regional Climate Change Compact](#), now over 11 years old, demonstrates that large regions of Florida are working for climate change mitigation and adaptation, and we need our energy providers to lead ambitiously as well.

Adding solar photovoltaics to the DEF energy portfolio is a critical step along the difficult, but necessary path to achieve 100% Clean Energy and the above beneficial outcomes that can result from a just transition to clean energy. In addition, expanded solar options and access are needed by the city's residents and businesses, including renters and those who cannot or choose not to install a solar system due to financial or other considerations.

For these reasons, we encourage the Commission to take steps to approve Duke's Clean Energy Connection program.

Additionally, we would like to highlight several ways that Duke worked collaboratively with Florida cities and counties via the Southeast Sustainability Directors Network to consider and incorporate feedback when designing its program. Specifically, Duke:

1. Increased the size of the CEC's low-income offering to reflect the percentage of residential customers living in poverty in its service territory;
2. Significantly increased the allocation of the program's benefits to non-participants;
3. Established a set aside and an extended enrollment window for local governments;
4. Agreed to analyze a future program add-on that would include battery systems paired with on-site solar to support public health and safety outcomes and the resilience of critical infrastructure; and
5. Agreed to conduct competitive solicitations, consider third-party development projects for its 10 CEC solar sites, and not to propose changes to its net energy metering tariff before 2023 — to support local job creation and Florida's growing clean energy industry and to engage stakeholders in the pre-filing stipulation prior to proposing changes to net metering.

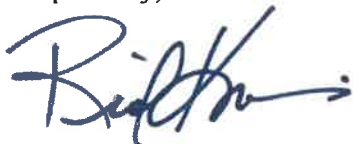
The City of St. Petersburg supports the DEF CEC program and appreciates the opportunity to be an early subscriber. The City would also like to take this opportunity to highlight additional areas of change or improvement that the city continues to request from and work with DEF on:

- **Duke CEC Program: Qualify all DEF electric use within subscription program.** Specifically, streetlight electricity is not currently qualified within subscription. Streetlights or other lighting represent a significant portion of local government and sometimes large commercial electricity use. City would like to have the option to a subscription level that included streetlight electricity use.
- **Renewable Portfolio Standards (RPS)** – Florida is one of 12 states that do not require energy providers have a minimum amount of renewable energy in their portfolios.
- **Third-party sales** – Florida is one of 4 states where the law prohibits the sale of power to the public by anyone other than “public utility” limiting transfers of surplus renewable energy on site. This hinders genuine Community Solar, third-party energy producers (including renewable energy facilities), and microgrid development.
- **More inclusive and formalized utility program and resource planning**, including prior to and as a part of formal PSC processes.
- **Promote electric vehicles (EV) and EV infrastructure**
- **Stabilize net metering**
- Require Florida electric utilities to share with local governments **anonymized energy consumption data at the census block level** to allow cities and counties to effectively design and implement their own energy conservation programs for residents and businesses.

Finally, if approved, this program would complement Florida Power and Light’s SolarTogether program, significantly enhance access to clean energy across the state, and continue to set the standard for voluntary clean energy offerings for other utilities in Florida and nationally.

I appreciate your consideration of my comments. Please do not hesitate to contact me at 727-893-7201 or Richard.Kriseman@stpete.org with any questions.

Respectfully,



Rick Kriseman
Mayor
City of St. Petersburg