



VOTE SOLAR

October 28, 2020

VIA ELECTRONIC FILING

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: *Petition by Duke Energy Florida, LLC for a limited proceeding to approve Clean Energy Connection Program and Tariff and Stipulation; Docket No. 20200176-EI*

Dear Mr. Teitzman:

Enclosed for filing on behalf of Vote Solar is Vote Solar's prehearing statement in Docket No. 20200176.

Thank you for your assistance in this matter. Please feel free to reach out to me at (706)224-8017 should you have any questions concerning this filing.

Sincerely,

s/ Katie Chiles Ottenweller

Katie Chiles Ottenweller

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition for a limited proceeding to
approve Clean Energy Connection program and
tariff and stipulation, by Duke Energy Florida,
LLC.

Docket No. 20200176-EI

DATED: October 28, 2020

**VOTE SOLAR'S
PREHEARING STATEMENT**

A. APPEARANCES:

Katie Chiles Ottenweller
Southeast Director
Vote Solar
838 Barton Woods Road NE
Atlanta, GA 30307
katie@votesolar.org
Phone: 706.224.8017

Qualified Representative for Vote Solar

Katie Chiles Ottenweller has been designated as a qualified representative, authorized to represent the interests of Vote Solar before the Florida Public Service Commission, pursuant to Order No. PSC-2020-0021-FOF-OT (issued January 13, 2020).

B. WITNESSES:

Vote Solar is not calling any witnesses.

C. EXHIBITS:

Vote Solar does not have any exhibits.

D. STATEMENT OF BASIC POSITION:

Vote Solar's Statement of Basic Position:

Vote Solar supports the Clean Energy Connection program and tariff as reflected in the Stipulation entered into by Duke Energy Florida (“DEF”), Southern Alliance for Clean Energy, Walmart and Vote Solar as a reasonable resolution of the issues raised by this filing (Stipulation attached to DEF’s petition as Exhibit A). According to DEF, the Clean Energy Connection program will provide an estimated \$533 million dollars in economic benefits, which are allocated so that 12.7% flow to participants and 87.3% flow to the general body of DEF customers. Vote Solar believes that this benefit-sharing arrangement is both an innovative and a fair way to apportion the benefits of the program, and reflects the specific needs and interests of various customer segments.

The program will diversify Florida’s energy mix with clean, fuel-free electricity, and will provide a much-needed option for customers seeking more access to solar power. The provisions in the Stipulation strengthen DEF’s Clean Energy Connection program by securing a separate capacity allocation for local government customers that face unique barriers to accessing clean energy and need longer lead time to enroll in solar offerings. The importance of this offering for local government clean energy access is evident from letters of support that have been filed in Docket 20200176-EI by the City of St. Petersburg, the City of New Port Richey, the City of Tarpon Springs, the City of Clearwater, the City of DeLand, the City of Dunedin, the City of Treasure Island, Pinellas County, Orange County and the Southeast Sustainable Directors Network. The program also contains significant benefits for low income subscribers, including a capacity set-aside that will create immediate savings for these customers; a “hold harmless” to ensure their bills do not increase due to enrollment; co-marketing of the program with existing

energy efficiency programs; and ability to enroll regardless of a customer's arrearage status.

The Stipulation also includes commitments from DEF to glean information gained from the program to evaluate future deferment of planned gas infrastructure; to collect and share data with stakeholders on customers' own investments in solar PV; to utilize a competitive solicitation process in its development of the solar resources; and to conduct an analysis of a potential future add-on program mobilizing battery storage paired with on-site solar for back-up power at critical loads. Vote Solar believes that these commitments will continue to advance DEF's, stakeholders' and the Commission's experience and knowledge concerning solar resources.

For all these reasons, Vote Solar asks the Commission to approve the Clean Energy Connection program and tariff as reflected in the Stipulation.

E. STATEMENT OF ISSUES AND POSITIONS

ISSUE 1: Should the Commission approve the Stipulation for approval of the Duke Energy Florida, LLC, Clean Energy Connection Program and Tariff, when taken as a whole, as in the public interest?

VOTE SOLAR: Yes. The Stipulation for approval of the Clean Energy Connection program and tariff, when taken as a whole, is in the public interest, and should be approved by the Commission.

F. STIPULATED ISSUES:

Vote Solar: DEF, SACE, Walmart and Vote Solar entered into a Stipulation for which approval is sought by DEF's Petition for a limited proceeding to approve Clean Energy Connection Program and Tariff and Stipulation filed on July 1, 2020.

G. MOTIONS:

Vote Solar: None at this time.

H. PENDING REQUEST OR CLAIMS FOR CONFIDENTIALITY:

Vote Solar: None at this time.

I. OBJECTIONS TO A WITNESS'S QUALIFICATION AS AN EXPERT:

Vote Solar: None at this time.

J. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

Vote Solar: Vote Solar complied with all requirements in the Order Establishing Procedure.

DATED this 28th day of October, 2020.

Respectfully submitted,

/s/ *Katie Chiles Ottenweller*

Katie Chiles Ottenweller
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Qualified Representative for Vote Solar

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Vote Solar's Prehearing Statement has been served by electronic mail to the following on October 28, 2020:

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/s/ Katie Chiles Ottenweller
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