

**Jacob Veauhn**

---

**From:** Jacob Veauhn on behalf of Records Clerk  
**Sent:** Monday, February 1, 2021 9:37 AM  
**To:** 'info@evergladescoalition.org'  
**Cc:** Consumer Contact  
**Subject:** FW: Docket No. 20200181; Everglades Coalition Resolution Supporting Modernizing Florida's Outdated Efficiency Practices  
**Attachments:** Jan 2021\_RESOLUTION OF THE EVERGLADES COALITION ENCOURAGING THE FLORIDA PUBLIC SERVICE COMMISSION TO REFORM ITS 30-YEAR OLD ENERGY EFFICIENCY GOAL SETTING ECONOMIC SCREENING PRACTICES IN ORDER TO PROMOTE HIGHER LEVELS OF ENERGY SAVINGS.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good Morning, Kaitlynn Reneke

We will be placing your comments below in consumer correspondence in Docket No. 20200181 and forwarding your comments to the Office of Consumer Assistance and Outreach.

**Jacob Veauhn**

Commission Deputy Clerk I  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399  
[Jacob.Veauhn@psc.state.fl.us](mailto:Jacob.Veauhn@psc.state.fl.us)  
850.413.6656

**From:** Everglades Coalition <info@evergladescoalition.org>  
**Sent:** Friday, January 29, 2021 6:10 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>; Office of Commissioner Brown <Commissioner.Brown@psc.state.fl.us>; Office of Commissioner Fay <Commissioner.Fay@psc.state.fl.us>; Office of Commissioner La Rosa <Commissioner.LaRosa@psc.state.fl.us>; Office of Commissioner Graham <Commissioner.Graham@PSC.STATE.FL.US>; Office of Chairman Clark <Commissioner.Clark@psc.state.fl.us>  
**Subject:** Docket No. 20200181; Everglades Coalition Resolution Supporting Modernizing Florida's Outdated Efficiency Practices

Dear Public Service Commission,

The Everglades Coalition, with its more than sixty member organizations committed to the protection and restoration of America's Everglades, hereby urges the PSC, through its conservation goal setting rulemaking process, to reform decades-old conservation goal setting practices to comport with national best practices in order to move the state to a more sustainable and water-smart clean energy future while also providing economic, environmental, and public health benefits. **Please accept the attached resolution.**

Please do not hesitate to reach out with any questions.

Thank you,  
Kaitlynn Reneke  
Administrative Coordinator, Everglades Coalition  
[info@evergladescoalition.org](mailto:info@evergladescoalition.org)  
[www.evergladescoalition.org](http://www.evergladescoalition.org)



# Everglades Coalition

1000 Friends of Florida  
Angler Action Foundation  
Audubon Florida  
Audubon of Southwest Florida  
Audubon of the Western Everglades  
Audubon Everglades  
Backcountry Fly Fishers of Naples  
Calusa Waterkeeper  
Cape Coral Friends of Wildlife  
Center for Biological Diversity  
Conservancy of Southwest Florida  
Defenders of Wildlife  
“Ding” Darling Wildlife Society  
Earthjustice  
Environment Florida  
Everglades Foundation  
Everglades Law Center  
Everglades Trust  
Florida Bay Forever  
Florida Conservation Voters Education Fund  
Florida Defenders of the Environment  
Florida Keys Environmental Fund  
Florida Native Plant Society  
Florida Oceanographic Society  
Friends of the Arthur R. Marshall  
Loxahatchee National Wildlife Refuge  
Friends of the Everglades  
Hendry-Glades Audubon Society  
International Dark-Sky Association,  
FL Chapter  
Izaak Walton League of America  
Izaak Walton League Florida Division  
Izaak Walton League Florida Keys Chapter  
Izaak Walton League Mangrove Chapter  
Lake Worth Waterkeeper  
Last Stand  
League of Women Voters of Florida  
Martin County Conservation Alliance  
Miami Pine Rocklands Coalition  
Miami Waterkeeper  
National Audubon Society  
National Parks Conservation Association  
National Wildlife Refuge Association  
Natural Resources Defense Council  
North Carolina Outward Bound School  
Ocean Research & Conservation Association  
Peace River Audubon Society  
Reef Relief  
Sanibel-Captiva C  
Sierra Club  
Sierra Club Florida Chapter  
Sierra Club Broward Group  
Sierra Club Calusa Group  
Sierra Club Central Florida Group  
Sierra Club Loxahatchee  
Sierra Club Miami  
South Florida Audubon Society  
Southern Alliance for Clean Energy  
The Florida Wildlife Federation  
The Institute for Regional Conservation  
The National Wildlife Federation  
Theodore Roosevelt Conservation  
Partnership  
Tropical Audubon Society

## **A RESOLUTION OF THE EVERGLADES COALITION ENCOURAGING THE FLORIDA PUBLIC SERVICE COMMISSION TO REFORM ITS 30-YEAR OLD ENERGY EFFICIENCY GOAL SETTING ECONOMIC SCREENING PRACTICES IN ORDER TO PROMOTE HIGHER LEVELS OF ENERGY SAVINGS**

WHEREAS, the Everglades ecosystem has competing demands for water, including from the power sector, and water quality and quantity are critical for Everglades restoration;

WHEREAS, energy efficiency is widely understood to be the cleanest, quickest and most cost-effective resource in meeting electricity demand; and

WHEREAS, unlike conventional power generation, energy efficiency allows the utility to meet electricity demand with zero air emissions and no water use, thereby moving the state, and country to a cleaner and more sustainable and water-smart energy future;

WHEREAS, by reducing electricity demand, energy conservation reduces the need for the construction of new power plants and infrastructure that break up habitat and can impact water quality and quantity and reduces the operation of existing fossil fuel plants, not only lowering costs to customers but reducing greenhouse gas emissions, and air pollution that have a negative effect on public health and the environment; and

WHEREAS, the Florida Legislature passed the Florida Energy Efficiency and Conservation Act (“FEECA”) in 1980 to reduce peak electricity demand and energy consumption<sup>1</sup>; and

WHEREAS, the Florida Public Service Commission (PSC) is statutorily required to establish conservation goals for FEECA utilities and review such goals every five years, at a minimum; and

WHEREAS, in turn, the utilities are required to develop cost-effective demand-side management plans that meet those goals and submit them to the PSC for approval; and

<sup>1</sup> Section 366.81, Fla. Stat.

*Committed to full protection and restoration of America’s Everglades*

4222 22nd Ave S #530218, Saint Petersburg, FL 3374

[www.evergladescoalition.org](http://www.evergladescoalition.org) | [info@evergladescoalition.org](mailto:info@evergladescoalition.org)

WHEREAS, in the most recent conservation goal setting proceeding in 2019, several large utilities filed proposed energy savings goals of zero or near zero; and

WHEREAS, the utilities' proposed goals were established by relying on economic screens such as the Rate Impact Measure (RIM) test and the 2-year payback screen that no other state in the nation relies upon for setting goals and has landed Florida near the bottom of state rankings on energy savings through utility efficiency programs<sup>2</sup>; and

WHEREAS, the PSC has established a rulemaking docket to consider changes in the process by which conservation goals are set and customer programs are approved in the future<sup>3</sup>; and

WHEREAS, the rulemaking process affords the PSC the unique opportunity to modernize its FEECA rules to end its reliance on these outdated economic screens and to increase the focus of conservation goals and programs to address meaningful energy savings opportunities and reduce the energy burdens of low to moderate income customers;

WHEREAS, reforming goal setting and approval of customers programs to national best practices in this area will generally lead to more robust energy efficiency programs offered to residential and commercial customers that will reduce energy waste and provide economic and environmental benefits;

**NOW THEREFORE BE IT RESOLVED,**

The Everglades Coalition, with its more than sixty member organizations committed to the protection and restoration of America's Everglades, hereby urges the PSC, through its conservation goal setting rulemaking process, to reform decades-old conservation goal setting practices to comport with national best practices in order to move the state to a more sustainable and water-smart clean energy future while also providing economic, environmental, and public health benefits.

**APPROVED AND ADOPTED** this 26<sup>th</sup> day of January, 2021



Mark Perry  
Co-Chair



Marisa Carrozzo  
Co-Chair

<sup>2</sup> American Council for an Energy Efficient Economy, *State Energy Efficiency Scorecard*, December 2020, p. 32.

<sup>3</sup> Florida Public Service Commission, Docket No. 20200181

*Committed to full protection and restoration of America's Everglades*