

**Antonia Hover**

**From:** Betty Leland on behalf of Office of Commissioner Graham  
**Sent:** Monday, February 15, 2021 4:19 PM  
**To:** Commissioner Correspondence  
**Subject:** FW: Goals for Electric Utilities Rule Development Workshop; Docket #20200181  
**Attachments:** AF FEECA Letter w sign ons.pdf

Good Afternoon:

Please place this email in Docket #20200181.

Thanks.

*Betty Leland, Executive Assistant to  
Commissioner Art Graham  
Florida Public Service Commission  
[bleland@psc.state.fl.us](mailto:bleland@psc.state.fl.us)  
(850) 413-6024*

---

**From:** Alvi, Beth [mailto:[Beth.Alvi@audubon.org](mailto:Beth.Alvi@audubon.org)]  
**Sent:** Monday, February 15, 2021 3:31 PM  
**To:** Records Clerk; Office of Chairman Clark; Office of Commissioner Graham; Office of Commissioner Brown; Office of Commissioner Fay; Office of Commissioner La Rosa  
**Cc:** Wraithmell, Julie; David Glassner  
**Subject:** Goals for Electric Utilities Rule Development Workshop; Docket #20200181

Dear Public Service Commission and Staff,  
Please accept Audubon Florida's comments on the FEECA rulemaking workshop. Thank you for the opportunity to provide input. Please let us know if we can provide additional information.

Regards,  
Beth Alvi

Elizabeth Alvi  
Director of Policy  
W:850-999-1028  
C:850-591-9784 (call/text)  
[balvi@audubon.org](mailto:balvi@audubon.org)

Audubon Florida  
308 N. Monroe Street  
Tallahassee, FL 32301  
FL.Audubon.org



February 15, 2021

Chairman Gary F. Clark  
Commissioner Julie I. Brown  
Commissioner Art Graham  
Commissioner Andrew G. Fay  
Commissioner Mike La Rosa

Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

**Re: Goals for Electric Utilities Rule Development Workshop; Docket #20200181**

Dear Florida Public Service Commission and Staff,

Audubon Florida and the undersigned Audubon chapters appreciate the Commission and Staff's efforts to address the Florida Energy Efficiency and Conservation Act (FEECA) in the January 14, 2021 workshop.

Audubon Florida has a 120-year history of advocating for environmental protections and conservation policies based on sound science. Our dedicated advocates, including the undersigned chapter leaders, recognize that achieving our conservation goals is only possible if we mitigate the impacts of climate change and work towards more equitable communities. The opportunity to amend the FEECA rule is central to these issues.

**We urge the Commission to direct staff to expand the rulemaking scope to include the entirety of FEECA. We ask that the Commission utilize 3<sup>rd</sup> parties for feasibility and market potential studies; employ alternate cost-effectiveness tests to assess DSM programs; develop an incentive structure for energy efficiency goals; and set energy efficiency goals at higher rates.**

**3rd Party Studies**

Rather than instructing utilities to conduct their own potential studies, the Commission should order a statewide feasibility and market potential study conducted by a neutral 3<sup>rd</sup> party answerable to the commission to inform energy efficiency goals, which would ensure greater consistency across utilities. Additionally, the Commission should convene a transparent stakeholder process to establish baseline input assumptions for the study through a process of mutual agreement between staff, economists, academics, and regulatory professionals.

**Adapt Economic Tests of Cost-Effectiveness of DSM Programs**

Florida is the only state that relies on the Rate Impact Measure (RIM) test as the primary method for determining cost-effectiveness of demand-side management (DSM) programs. The RIM Test is deeply flawed. We recommend the Commission follow the lead of leading energy efficiency states in adopting the Total Resource Cost test as the primary cost-effectiveness test or at a minimum open a transparent

stakeholder process to review the established cost-effectiveness testing methods and determine the best path for Florida to achieve the goals of FEECA: to decrease consumption and improve efficiency.

Use of the Participant Cost Test (PCT) should also be reviewed to ensure achievement of energy efficiency. By limiting projects to those outside the 2-year payback window, customers are unable to implement rapid, proven measures that advance FEECA's intended goals and targets.

### **Align Incentives to Reach Energy Efficiency Goals**

Amendments to the FEECA rule should seek to better align utility, consumer and conservation interests by following industry best practices including decoupling and establishing performance-based metrics and incentives for utilities' energy efficiency and conservation efforts. Utilities provide a necessary public service; their dedication to its improvement should be rewarded.

By adopting efficiency best practices that have been implemented in other states currently exceeding the national average in energy efficiency and conservation goals, the commission can establish mutually beneficial results for utility shareholders and ratepayers.

### **Set Energy Efficiency Goals at Higher Rates**

Using the above recommendations, Audubon Florida asks that the Commission only approve utility energy efficiency goals at rates closer to 1% than 0%. While Florida sits at the bottom of the list in energy efficiency and conservation, other states are improving year-over-year. With support from the Commission and Staff in implementing the aforementioned amendments to the rule, Florida can rise through the ranks. By establishing meaningful savings targets, the Commission can help reduce energy and natural resource waste, lower system peak usage and costs, spur local job growth, save consumers money, and realize significant environmental benefits for all Floridians.

### **Conclusion**

Utilities are tasked with simultaneously improving and expanding service to their customers and returning benefit to their shareholders. With the above recommendations, the Commission and the utilities will gain the capacity and security needed to set – and achieve – energy efficiency and conservation goals near 1%, while providing benefit to all stakeholders and ratepayers.

Energy efficiency efforts have lasting positive economic impacts, from reducing customers' bills to creating jobs. With the ongoing effects of the pandemic, Floridians need cost savings now more than ever. Additionally, robust energy efficiency programs are integral to emissions mitigation. Energy conservation decreases the peak demand that utilities must provide; reducing consumption lessens emissions from both traditional and renewable energy generation and protects our natural resources.

A modernized FEECA rule can provide jobs, clean air and water, and economic and natural resilience. Thank you for ensuring Florida can be a leader in this essential work.

Sincerely,

A handwritten signature in blue ink that reads "Julie Wraithmell". The signature is fluid and cursive, with a large loop at the end of the last name.

Julie Wraithmell  
Executive Director

Bev Hansen,  
President,  
Hernando Audubon Society

Anne Casella  
Conservation Chair  
Alachua Audubon

Bill and Marsha Cox  
Co-Presidents  
Southeast Volusia Audubon Society

Scott Zucker  
President  
Audubon Everglades

Paola Ferreira  
Executive Director  
Tropical Audubon

Valerie Thomas  
Co-President  
Four Rivers Audubon

Geri Reaves  
President  
Audubon of Southwest Florida

Steve Buczynski  
President  
Hendry/Glades Audubon

Phyllis Hall  
President and Conservation Chair  
Seminole Audubon Society

Martin Schwartz  
President  
Marion Audubon Society

Michael Brower  
President  
Francis M. Weston Audubon Society

Richard Baker, Ph.D.  
President  
Pelican Island Audubon Society

John Nelson  
President  
Audubon of Martin County

Donna Legare  
President  
Apalachee Audubon

David Hartgrove  
President & Conservation Chair  
Halifax River Audubon

Dan Savercool, CSE, CERP  
President  
St. Petersburg Audubon Society

Carol Bailey-White  
President  
Duval Audubon Society

Stephanie Gaspar  
President  
Kissimmee Valley Audubon Society

Arnette Sherman  
President  
West Volusia Audubon Society, Inc

Sallie Carlock  
President  
Santa Fe Audubon Society

Mary Keith  
President  
Tampa Audubon

Kim Begay  
Vice President and Conservation Chair  
Clearwater Audubon

Jim Stahl  
President  
Space Coast Audubon

Deborah Green  
President  
Orange Audubon

Katherine Prophet  
President  
Manatee Audubon

Lynn Marcoux  
Co-President  
Bay County Audubon

Jack Foard  
President  
Venice Area Audubon

Christine Rowland  
President  
West Pasco Audubon

Simona Burshteyn  
President  
South Florida Audubon