

**Antonia Hover**

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**From:** Antonia Hover on behalf of Records Clerk  
**Sent:** Monday, February 15, 2021 5:01 PM  
**To:** 'Jeff.Benavides@ocfl.net'  
**Cc:** Consumer Contact  
**Subject:** FW: Public Comment, Local Government Name, for Docket No. 20200181 (Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities)  
**Attachments:** Docket No. 20200181-Orange County, FL.pdf

Good Afternoon, Mr. Benavides.

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

Thank you!

*Toni Hover*  
Commission Deputy Clerk I  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399  
Phone: (850) 413-6467

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**From:** Jeff.Benavides@ocfl.net <Jeff.Benavides@ocfl.net>  
**Sent:** Monday, February 15, 2021 4:53 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Public Comment, Local Government Name, for Docket No. 20200181 (Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities)

Good Afternoon Chairman and Commissioners:  
Please place the attached letter in Docket No. 20200181 on behalf of City/County Name.

Thank you in advance for confirming receipt of this email and the attachment.

**Jeff Benavides**, LEED AP O+M, GGP, ISSP-SPC, NABCEP-PVA  
**Chief Sustainability and Resilience Officer**  
**County Administrator's Office**  
**Orange County Government**  
201 S. Rosalind Avenue, 5th Floor  
Orlando, Florida 32801  
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PLEASE NOTE: Florida has a very broad public records law (F. S. 119). All e-mails to and from County Officials are kept as a public record. Your e-mail communications, including your e-mail address may be disclosed to the public and media at any time.



February 11, 2021

Chairman Gary F. Clark  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

Docket No. 20200181, Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities

Dear Chairman Clark:

Thank you for the opportunity to comment on the Public Service Commission's (PSC) upcoming Florida Energy Efficiency and Conservation Act (FEECA) review. Orange County respectfully requests that the PSC enhance efforts by utility providers throughout the State of Florida to increase their energy efficiency goals, programs, and policies.

The FEECA review presents an opportunity for updating outdated economic screening practices used to establish energy conservation goals at a time when these needs are most critical. Energy efficiency programs help reduce the energy burden of our most vulnerable low-income residents. Given the continuing economic challenges resulting from the pandemic, programs that help consumers reduce energy waste and save money on their power bills are more important than ever. The PSC can strengthen and update its energy efficiency policies and programs by doing the following:

- Equally account for energy efficiency with other utility resources by primarily using the total resource cost test (TRC) to evaluate the costs and benefits of energy efficiency in setting goals. Other states utilize the participant cost test (PCT) and the rate impact measurement (RIM) to determine specific program design, administrative costs, and other considerations;
- Energy efficiency investments should be held to similar screening standards as other investments such as power plants, transmission lines, and substations. The two-year payback screen should be benchmarked and evaluated against other state standards.
- Create a low-income customer advisory board or other public consumer feedback tool to guide the PSC and Florida's utilities in the design and implementation of inclusive and low-income policies and programs;
- Adopt policies to support new and expanded energy-saving programs for low-income Floridians. Identify an annual budget minimum threshold allocated for low-income programs and include a methodology to evaluate the cost-effectiveness of these programs and the health and safety benefits. These programs should be inclusive of single-family, multi-family, and income qualifying commercial properties;

**Byron W. Brooks, A.I.C.P., County Administrator**  
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- Adopt policies to support a variety of new financial tools that offer flexibility of payments such as prepaid programs, flexible pay, and on-bill financing;
- Conduct a second workshop, focused on analyzing the draft rule and addressing the systematic goal of meaningful statewide energy efficiency.

In 2007, Orange County adopted its first Climate Protection Campaign which outlined strategies to support energy conservation and the growth of renewable energy in our region. This year, Orange County Mayor Jerry L. Demings unveiled the Sustainable Operations and Resilience Action Plan. We are committed to building a community of tomorrow that prioritizes clean energy and energy efficiency for all residents and businesses. The Action Plan includes a roadmap to reduce 30% of building and infrastructure energy use by 2025 and a plan to achieve 100% of County operations electricity load from clean, renewable sources by 2035.

Mayor Demings serves as the co-chair of the Florida Association of Counties' Urban Caucus along with Pinellas County Commissioner Janet Long. This caucus recently identified Energy Efficiency as a legislative priority for 2021, requesting that the PSC "reform its rules to reflect best practices in other states on setting efficiency goals". Together, these actions will ensure Florida remains sustainable and resilient for its residents, businesses and visitors. Orange County is ready and able to play a key role in planning and development efforts to ensure that our Sustainability & Resilience goals and future plans are in alignment with the state-wide energy goals.

For any future correspondence, please contact Orange County Government Chief Sustainability and Resilience Officer, Jeff Benavides, at 407-836-7389 or e-mail: [jeff.benavides@ocfl.net](mailto:jeff.benavides@ocfl.net).

Sincerely,



Byron W. Brooks, AICP  
County Administrator

BWB/jb

c: Mayor Jerry L. Demings  
Commissioner Nicole H. Wilson, District 1  
Commissioner Christine Moore, District 2  
Commissioner Mayra Uribe, District 3  
Commissioner Maribel Gomez Cordero, District 4  
Commissioner Emily Bonilla, District 5  
Commissioner Victoria P. Siplin, District 6  
Jeffrey Newton, County Attorney  
Roseann Harrington, Chief of Staff, Mayor's Office  
Jeff Benavides, Chief Sustainability and Resilience Officer  
Kelley Teague, Director, Legislative Affairs,