

Jacob Veauhn

From: Office of Commissioner Brown
Sent: Tuesday, February 16, 2021 8:34 AM
To: Commissioner Correspondence
Subject: Docket No. 20200181
Attachments: Docket No. 20200181; Modernize Florida's outdated energy savings practices; Docket No. 20200181; Modernize Florida's outdated energy savings practices; Goals for Electric Utilities Rule Development Workshop; Docket #20200181

Please place the attached in Docket No. 20200181.

Thank you!

Jacob Veauhn

From: Alvi, Beth <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
Attachments: AF FEECA Letter w sign ons.pdf

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
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balvi@audubon.org

Audubon Florida
308 N. Monroe Street
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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 3rd 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 3rd 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.

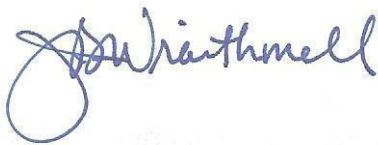
Conclusion

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.
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Pelican Island Audubon Society

John Nelson
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Audubon of Martin County

Donna Legare
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Apalachee Audubon

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Halifax River Audubon

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Stephanie Gaspar
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Kissimmee Valley Audubon Society

Arnette Sherman
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West Volusia Audubon Society, Inc

Sallie Carlock
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Santa Fe Audubon Society

Mary Keith
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Tampa Audubon

Kim Begay
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Clearwater Audubon

Jim Stahl
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Space Coast Audubon

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Orange Audubon

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Lynn Marcoux
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Jack Foard
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Venice Area Audubon

Christine Rowland
President
West Pasco Audubon

Simona Burshteyn
President
South Florida Audubon

Jacob Veaughn

From: Cgerstle@everyactioncustom.com on behalf of Claude Gerstle
<Cgerstle@everyactioncustom.com>
Sent: Monday, February 15, 2021 6:07 PM
To: Office of Commissioner Brown
Subject: Docket No. 20200181; Modernize Florida's outdated energy savings practices

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Dear Commissioner Julie Brown,

Florida is one of the most vulnerable states to the effect of global warming increasing the risk of flooding, damage from more severe hurricanes and increased energy demands in the summer due to higher temperatures. To adapt Florida will be adding millions of electric vehicles, not just cars but even heavy-duty trucks so our electric grid must not only be bidirectional but have management that can handle large load changes and resolve phase and frequency problems in a matter of milliseconds, not minutes. This should be the number one priority of the public service commission.

Part of our transportation sector is not amenable to electrification so we must develop a hydrogen-based economy as well. As more of our trash and biomass is utilized for hydrogen production those industries will at times have excess power and need to be able to sell it to the grid for a fair price. As more and more companies and individuals produce renewable energy the PSC has to oversee prices the utilities can charge for connection and transmission. It has to take into consideration the need for and value of battery storage attached to the grid especially in view of the severe energy shortage we saw this past week in the Midwest where solar panels were covered in snow and wind turbines produce and could not operate.

As we move to more solar capacity the PSC must make sure that our renewable portfolio is adequate in the winter when there is much less solar capacity availability.

Finally, the best way to keep people's electric bills low is for commercial buildings and residential structures to use energy most efficiently. The utilities should help ratepayers determine the most cost-effective ways to reduce their energy use. They need to identify buildings with above average power use and proactively help them find ways to reduce that usage.

The practices the Commission relies upon in setting goals for the state's largest utilities haven't been modernized in almost 30 years – and that has led to Florida's largest power companies badly trailing leading utilities in the Southeast and across the nation in delivering energy savings to families and businesses. Most recently, economic screens - used only in Florida - like the 2-year screen and the Rate Impact Measure (RIM) test led to power companies proposing goals of zero. Your practices should not penalize efficiency measures that meaningfully reduce energy waste for homes or businesses. That doesn't serve the best interest of customers or the state.

Let's consider ways to encourage utilities to do more on efficiency, in particular for low-income customers.

You have a unique opportunity through this rulemaking process to reform practices so they reflect modern state industry standards. The scope of this rulemaking should be broad enough to inform you about approaches used in other states - and how they might be adapted for Florida.

A lot has changed in 30 years, our state rules on helping customers use energy smarter should keep up as well.

Sincerely,
Claude Gerstle
Delray Beach, FL 33446
Cgerstle@alum.mit.edu

Jacob Veaughn

From: kraushouse5@everyactioncustom.com on behalf of POLLY KRAUS <kraushouse5@everyactioncustom.com>
Sent: Monday, February 15, 2021 7:53 PM
To: Office of Commissioner Brown
Subject: Docket No. 20200181; Modernize Florida's outdated energy savings practices

Dear Commissioner Julie Brown,

We know that energy efficiency is the quickest, cleanest, and cheapest way to meet our energy needs while also helping Floridians cut energy waste and save money on power bills. Helping hard-working families make their homes more efficient, safer, and secure also keeps energy dollars in local communities and drives economic growth and job creation.

Yet the practices the Commission relies upon in setting goals for the state's largest utilities haven't been modernized in almost 30 years – and that has led to Florida's largest power companies badly trailing leading utilities in the Southeast and across the nation in delivering energy savings to families and businesses. Most recently, economic screens - used only in Florida - like the 2-year screen and the Rate Impact Measure (RIM) test led to power companies proposing goals of zero. Your practices should not penalize efficiency measures that meaningfully reduce energy waste for homes or businesses. That doesn't serve the best interest of customers or the state.

Let's consider ways to encourage utilities to do more on efficiency, in particular for low-income customers.

You have a unique opportunity through this rulemaking process to reform practices so they reflect modern state industry standards. The scope of this rulemaking should be broad enough to inform you about approaches used in other states - and how they might be adapted for Florida.

A lot has changed in 30 years, our state rules on helping customers use energy smarter should keep up as well.

Sincerely,
POLLY KRAUS
Clearwater, FL 33764
kraushouse5@gmail.com