

**Jacob Veauhn**

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**From:** Jacob Veauhn on behalf of Records Clerk  
**Sent:** Tuesday, February 16, 2021 9:30 AM  
**To:** 'Cgerstle@alum.mit.edu'  
**Cc:** Consumer Contact  
**Subject:** RE: Docket No. 20200181; Modernize Florida's outdated energy savings practices

Good Morning, Claude Gerstle

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  
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-----Original Message-----

From: Cgerstle@everyactioncustom.com <Cgerstle@everyactioncustom.com>  
Sent: Monday, February 15, 2021 6:07 PM  
To: Records Clerk <CLERK@PSC.STATE.FL.US>  
Subject: Docket No. 20200181; Modernize Florida's outdated energy savings practices

Dear Florida PSC Commissioners,

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  
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Cgerstle@alum.mit.edu