

Jacob Veaghn

From: Jacob Veaghn on behalf of Records Clerk
Sent: Monday, March 1, 2021 2:58 PM
To: 'atobin@ctsfl.us'
Cc: Consumer Contact
Subject: FW: Public Comment, City of Tarpon Springs, for Docket No. 20200181 (Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities)
Attachments: Public Comment, City of Tarpon Springs, for Docket No. 20200181.pdf; Resolution 2021-06.pdf

Good afternoon , Mayor Alahouzos

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 Veaghn

Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
Jacob.Veaghn@psc.state.fl.us
850.413.6656

From: Ashley Tobin <atobin@ctsfl.us>
Sent: Friday, February 26, 2021 6:12 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Cc: Carol Renardo <crenardo@ctsfl.us>; Irene Jacobs <ijacobs@ctsfl.us>; Paul Smith <psmith@ctsfl.us>; Trish Hickey <thickey@ctsfl.us>
Subject: Public Comment, City of Tarpon Springs, for Docket No. 20200181 (Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities)

Hello:

Please place the attached letter in Docket No. 20200181 on behalf of the City of Tarpon Springs.

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

Sincerely,

Chris Alahouzos
Mayor



OFFICE OF
MAYOR AND COMMISSIONERS

City of Tarpon Springs, Florida

324 EAST PINE STREET
POST OFFICE BOX 5004
TARPON SPRINGS, FLORIDA 34688-5004
(727) 938-3711
FAX (727) 937-8199

February 18, 2021

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Re: Docket No. 20200181

Dear Chairman Clark and Commissioners Brown, Graham, Fay and La Rosa:

On behalf of the City of Tarpon Springs, I am writing this letter to transmit a copy of City Resolution 2021-06 approved by the Board of Commissioners that urges the Florida Public Service Commission (PSC) to fully explore revisions to the Florida Energy Efficiency and Conservation Act (FEECA) conservation goal setting rule. We recommend that a primary goal of this review be to increase the requirements for Florida electric utilities to provide energy efficiency programs and access to those programs to all customers, with particular consideration for low income customers.

We are keenly aware of the important role that robust energy efficiency programs can play in our community. Efficiency programs help our residents reduce energy use and save money on power bills – keeping more dollars in the local economy rather than leaving the state to bring in fuels from elsewhere.

Efficiency programs help reduce the energy burden – the disproportionately higher percentage of income – that our most vulnerable low-income residents pay for power bills. Offering programs to address the needs of low-income families is more important than ever given the continuing economic fallout from the COVID-19 crisis. The thousands of families that are in arrears on bills or have been disconnected lays bare the fact that at so many have unnecessarily high bills in the first place.

Energy efficiency is the quickest, cheapest and cleanest way to meet customer energy demand, and for local governments to meet climate sustainability and resilience goals. But, when energy savings targets are set too low by PSC Commissioners, electric utilities underinvest in energy efficiency. This limits customer access to the most effective methods to reduce monthly power bills and hinders our ability to both meet established local sustainability goals.

Specifically, we ask that the PSC consider requiring energy savings programs to include weatherization measures that promote participation by low income customers: mechanical

(e.g., heating and cooling systems), health and safety (e.g., ventilation systems), building shells (e.g., insulation), and electric baseload (e.g., lights and appliances). Some current examples that have found success include:

- high efficiency heat pump HVAC systems, as those upgrades are more cost efficient and provide a higher return on investment than refrigeration and lighting upgrades.
- enhanced programs for multifamily properties, since those units are an underserved market to deliver significant and aggressive greenhouse gas reductions.

In closing, we request that the PSC address the roadblocks holding back progress and ensure that those practices comport with national best practices. We believe that this will lead to the best outcome for the state and its citizens.

Sincerely,

A handwritten signature in black ink, appearing to read "C. J. Alahouzos". The signature is written in a cursive, slightly slanted style.

Chris Alahouzos
Mayor

RESOLUTION 2021-06

A RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE CITY OF TARPON SPRINGS ENCOURAGING THE FLORIDA PUBLIC SERVICE COMMISSION (“PSC”) TO REFORM DECADES-OLD ECONOMIC SCREENING PRACTICES IN SETTING ENERGY SAVINGS GOALS FOR FLORIDA ELECTRIC UTILITIES TO COMPORT WITH NATIONAL BEST PRACTICES IN ORDER TO PROMOTE THE SMARTER USE OF ENERGY THROUGH EFFICIENCY PROGRAMS TO FLORIDA’S COMMERCIAL AND RESIDENTIAL CUSTOMERS - WITH A FOCUS ON PROGRAMS FOR LOWER AND MODERATE INCOME HOUSEHOLDS; ALSO PROVIDING FOR TRANSMITTAL OF THE RESOLUTION TO THE COMMISSIONERS AND CLERK OF THE PSC AND FILING IN RELEVANT PSC DOCKETS; PROVIDING FOR SEVERABILITY; AND PROVIDING FOR AN EFFECTIVE DATE.

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

WHEREAS, energy efficiency measures constitute a low-cost resource that helps residential and commercial building owners use less energy, save money on bills, and reduce greenhouse gas emissions, while providing additional economic and societal benefits, including potential local job creation and economic growth; and

WHEREAS, the state of Florida, including the City of Tarpon Springs in particular is understood to be vulnerable to the impacts of climate change including rising sea levels, damaging hurricanes and storms, and extreme temperatures and increasing energy efficiency will both mitigate the drivers of climate change and facilitate adaptation to some effects, such as more frequent days with extreme high temperatures; and

WHEREAS, the City of Tarpon Springs has shown its commitment to mitigating and adapting to climate change through the formation of a Sustainability Advisory Committee to focus on recommending related actions the City may take moving forward; and

WHEREAS, the City’s Sustainability Advisory Committee recognizes the vital role of energy efficiency and supports this initiative; and

WHEREAS efforts undertaken by utilities and building owners in the state of Florida to expand renewable energy installations would be even more effective in meeting electricity demand if that demand were first reduced through energy conservation; and

WHEREAS, by reducing electricity demand, energy conservation reduces the need for the construction of new power plants and 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

WHEREAS low to moderate income residents pay a disproportionately higher percentage of their income on power bills and this energy burden has only been exacerbated by the economic downturn related to the Covid-19 pandemic; and

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

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

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; and

WHEREAS, this 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 energy savings opportunities at the utility system level and reduce the energy burdens of low to moderate income customers.

WHEREAS, Reforming goal setting and approval of customers programs to national best practices 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 BY THE BOARD OF COMMISSIONERS OF THE CITY OF TARPON SPRINGS THAT:

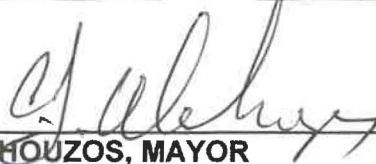
Section 1. The Board of Commissioners of the City of Tarpon Springs urges the PSC, through its conservation goal setting rulemaking process, to reform decades-old conservation goal setting practices to comport with national best practices in order to help drive the City's clean energy initiatives, and move the State of Florida on a path to significant economic, environmental, and public health benefits.

Section 2. The Board of Commissioners of the City of Tarpon Springs directs the City Clerk to provide copies of this Resolution to the Commissioners and Clerk of the PSC and authorizes filing of this Resolution in the FEECA rulemaking docket before the PSC,

Section 3. If any section, subsection, clause or provision of this resolution is held invalid, the remainder shall not be affected by such invalidity.

Section 4. This resolution shall take effect immediately upon adoption.

PASSED and ADOPTED this 9th day of February, 2021.



CHRIS ALAHOUZOS, MAYOR



JACOB KARR, VICE MAYOR



TOWNSEND TARAPANI, COMMISSIONER



CONNOR DONOVAN, COMMISSIONER



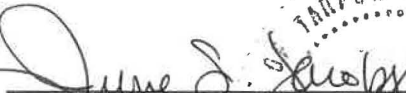
COSTA S. VATIKIOTIS, COMMISSIONER

MOTION BY: VICE MAYOR KARR
SECOND BY: COMMISSIONER DONOVAN

VOTE ON MOTION

COMMISSIONER VATIKIOTIS	<u>Yes</u>
COMMISSIONER DONOVAN	<u>Yes</u>
COMMISSIONER TARAPANI	<u>Yes</u>
VICE MAYOR KARR	<u>Yes</u>
MAYOR ALAHOUZOS	<u>Yes</u>

ATTEST:


IRENE S. JACOBS, CMC
CITY CLERK & COLLECTOR

APPROVED AS TO FORM:


THOMAS J. TRASK, B.C.S
CITY ATTORNEY

