

Antonia Hover

From: Hannah Barker
Sent: Monday, April 19, 2021 11:54 AM
To: Commissioner Correspondence
Subject: Docket Correspondence
Attachments: SG33-KM_45821041911460.pdf

Good morning,

Please place the attached letter in Docket No. 20200181.

Hannah E. Barker

Executive Assistant to Chairman Clark
Florida Public Service Commission
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[Tallahassee, FL 32399](#)
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East Central Florida Regional Planning Council

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Hugh W. Harling, Jr. P.E.
Executive Director

March 12, 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 provide these comments on the Public Service Commission's (PSC) upcoming Florida Energy Efficiency and Conservation Act (FEECA) review. On behalf of the thirty-seven formalized partners in the East Central Florida Regional Resilience Collaborative, a program of the East Central Florida Regional Planning Council, I respectfully request that the Commission 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The FEECA review presents an opportunity for updating outdated economic screening practices used to establish energy conservation goals at a time when these needs are most critical.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 power bills are more important than ever. The PSC can strengthen and update its energy efficiency policies and programs by:

- Equally accounting for energy efficiency with other utility resources by using the total Resource Cost Test (RCT) or the Participant Cost Test (PCT) to evaluate the costs and benefits of energy efficiency in setting goals, instead of the Ratepayer Impact Measure (RIM) test, and;
- Eliminating the "two-year payback screen" to evaluate energy efficiency investments, and;
- Adopting policies to support new and expanded energy-saving programs for low-income Floridians, such as a minimum budget requirement for low-income programs, and the incorporation of a benefit "adder" to evaluate the cost-effectiveness of low-income programs in order to effectively account for their health and safety benefits, and;

Executive Committee

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Chairman Gary F. Clark
March 12, 2021
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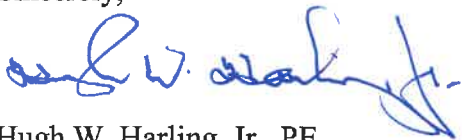
- Creating a low-income customer advisory board to guide the Commission and Florida's utilities in the design and implementation of low-income offerings and;
- Conducting a second workshop, focused on analyzing the draft rule and addressing the systematic goal of meaningful statewide energy efficiency.

Our Regional Resilience Collaborative established a call to action in a Memorandum of Understanding committing our regional local governments to increase resilience through the three pillars of People, (health + equity), Places, (built infrastructure + natural environment), and Prosperity (economic resilience). The commitment from five counties, and 22 cities and towns is intended to reduce risks, vulnerabilities, and our carbon footprint. The collaborative is currently working towards a regional greenhouse gas emissions inventory that will be used to identify areas for regional focus, goal development and to develop recommendations to target reductions and establish appropriate regional initiatives. In addition to reducing the energy burden on our residents, energy efficiency programs and policies will provide financial benefits for businesses and will aid in the reduction of emissions throughout our region.

Furthermore, the Florida Association of Counties 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. Our Regional Resilience Collaborative partners are ready and able to support the PSC and other stakeholders on planning and development to ensure that our goals and future plans are in alignment with the state-wide energy goals.

For any future correspondence, please contact East Central Florida Regional Planning Council, Resilience Officer, Jenifer Rupert, at 407-245-0300 or e-mail: jrupert@ecfrpc.org

Sincerely,



Hugh W. Harling, Jr., PE
Executive Director
East Central Florida Regional Planning Council

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