

**Jacob Veaghn**

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**From:** Cristina Slaton  
**Sent:** Monday, June 28, 2021 8:33 AM  
**To:** Commissioner Correspondence  
**Subject:** Docket Correspondence 20200181  
**Attachments:** Goals for Electric Utilities - Post Workshop Comments; Docket No. 20200181;  
Modernize Florida's outdated energy savings practices

Good morning,

Please place the email below in CORRESPONDENCE-Consumers & Representatives in docket 20200181.

Thank you,

*Cristina Slaton*

**EXECUTIVE ASSISTANT TO COMMISSIONER LA ROSA**  
**PHONE ~ 850.413.6018**  
**CSLATON@PSC.STATE.FL.US**

## Jacob Veauhn

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**From:** Achim Ginsberg-Klemmt <achim@gismopower.com>  
**Sent:** Friday, June 25, 2021 4:48 PM  
**To:** Office of Commissioner La Rosa  
**Subject:** Goals for Electric Utilities - Post Workshop Comments  
**Attachments:** PostWorkshopComments.pdf

Dear Commissioner LaRosa,

Please find attached my post-workshop comments.

Kind regards,  
Achim Ginsberg-Klemmt  
[www.gismopower.com](http://www.gismopower.com)

Achim Ginsberg-Klemmt 3364 Tanglewood Drive Sarasota FL 34239

Florida Public Service Commission  
Commissioner Mike LaRosa  
2540 Shumard Oak Blvd.  
Tallahassee FL 32399-0850

**Re. : Goals for Electric Utilities**  
**POST WORKSHOP COMMENTS**  
**Proposed amendment of Rule 25-17.0021, F.A.C. Docket No.20200181**

Sarasota June 25th 2021

Dear Commissioner LaRosa,

The audio quality at the last workshop was lamentable due to the rough telephone connection. Therefore I would like file my workshop speech in writing to this docket:

This commission is far removed from considering the full potential of demand-side renewable energy systems.

**First,** Demand-side solar system operators in Florida are currently compensated for their surplus electricity by using the “AS-AVAILABLE” energy tariff.

Avoided greenhouse gas emissions and carbon neutral solar-electricity produced at more expensive “PEAK” hours are being ignored.

This must change!

Onto the useless liability insurance for Tier 2 solar systems:

Chairman Clark; during the Renewable Generation Workshop in 2020 you asked your staff experts the following question: “***What liability does the insurance cover? What is the inherent risk? Is there one?***”

Your staff replied: “***I don’t believe there is; electrically.***”

Commissioner Graham, back in 2019 you told NY Times reporter Mr Ivan Penn that “..you think you could definitely do some things differently.”

According to your own experts, the insurance for Tier 2 solar systems is a senseless liability insurance which does not cover any real liability. What have you done differently since then to abolish this unbearable situation?

What kind of unarticulated risks are here at play other than FPL facing competition from business owners and homeowners who want to operate cost effective solar systems that break even instead of losing money?

Next, FPL issues solar permits based on “*115% of the customer’s past annual kWh consumption. This is subjective, arbitrary and not supported by any solar system owner or contractor that I have met.* You Allow FPL to cripple the capacity of demand-side solar systems during the permitting process, sabotaging the full potential of demand-side solar systems to grow and blossom!

Our family home has just celebrated 3 years of generating a slight surplus of electricity. We also celebrate 3 years of willfully violating our Tier1 Interconnect agreement with FPL.

Instead of the initially permitted 10KW with 39 solar panels, we chose to almost double that, which has allowed us to already reach carbon-neutral electricity generation in 2018.

A significant portion of our solar generating power is now contributed by GismoPower, a new Solar Carport concept designed by our daughter Antonia Ginsberg-Klemmt. Her invention just won her \$10,000 and the national recognition as the 2021 OZY Genius Award winner. If we are not sent to jail for violating the Tier 1 agreement we will be installing the second GismoPower prototype for New College of Florida in Sarasota.

You have the jurisdiction to make Antonia’s GismoPower fully legal and easy to permit for everyone who has a sufficient large breaker panel. Please take the full technical potential of demand-side solar systems into consideration and rewrite

the goals for Florida's electric utilities in a way that these corporations cannot act as quasi-governmental regulators. Please act now.

Sincerely,

Achim Ginsberg-Klemmt

[www.gismopower.com](http://www.gismopower.com)

## Jacob Veaghn

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**From:** Cgerstle@everyactioncustom.com on behalf of Claude Gerstle  
<Cgerstle@everyactioncustom.com>  
**Sent:** Sunday, June 27, 2021 7:41 PM  
**To:** Office of Commissioner La Rosa  
**Subject:** Docket No. 20200181; Modernize Florida's outdated energy savings practices

Dear Commissioner Mike La Rosa,

We know that energy efficiency is the quickest, cleanest, and cheapest way to meet our energy needs while also helping Floridians to cut energy waste and save money on power bills. Helping hard-working families and businesses use energy smarter employs over 100,000 Floridians, driving economic growth by keeping energy dollars in local communities.

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, Florida's use of outdated economic screens – like the two-year payback screen and the Rate Impact Measure (RIM) test, both of which penalize saving energy – led to power companies proposing goals of zero. Hardworking Floridians deserve access to programs that will help them lower their power bills – especially today.

It's time to move beyond practices that take real efficiency off the table.

You have a unique opportunity through this rulemaking process to reform practices so they reflect modern industry standards. Let's level the playing field so energy savings programs compete on a fair basis with costly new power plants. Let's capture technological innovation and put it to work for a smarter grid, and let's protect our most vulnerable customers by aiming to reduce the energy burden faced by so many hard-working families.

A lot has changed in 30 years. Let's modernize our practices to put efficiency to work for all in unlocking savings for Florida's families, businesses, and the state.

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