

Jacob Ve Vaughn

From: Jacob Ve Vaughn on behalf of Records Clerk
Sent: Wednesday, August 11, 2021 4:27 PM
To: 'James.Murley@miamidade.gov'
Cc: Consumer Contact
Subject: FW: Public Comment, Miami-Dade County, for Docket No. 20200181 (Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities)
Attachments: FEECA Letter Miami-Dade County-8-10-21.pdf
Importance: High

Good Morning, Jim Murley

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 Ve Vaughn

Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
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From: Murley, James (RER) <James.Murley@miamidade.gov>
Sent: Wednesday, August 11, 2021 3:59 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Cc: Murley, James (RER) <James.Murley@miamidade.gov>; Hefty, Nichole (RER) <Nichole.Hefty@miamidade.gov>; Andrews, George (Office of the Mayor) <George.Andrews@miamidade.gov>; McCrackine, Sean (Office of the Mayor) <Sean.McCrackine@miamidade.gov>; Gomez, Patricia (RER) <Patricia.Gomez@miamidade.gov>; Marello, Marta (RER) <Marta.Marello@miamidade.gov>; Klopp, Lisa (RER) <Lisa.Klopp@miamidade.gov>
Subject: Public Comment, Miami-Dade County, for Docket No. 20200181 (Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities)
Importance: High

Good Afternoon:

Please place the attached letter in Docket No. 20200181 on behalf of Miami-Dade County.

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

Sincerely,

Jim Murley
Chief Resilience Officer
111 NW 1st Street, 12 Floor
Miami, Florida 33128
(O) 305-375-5593

(C) 786-719-9155



August 10, 2021

Chairman Gary F. Clark
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

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

Dear Chairman and Commissioners,

Thank you for the opportunity to provide these comments on the Commission's proposed revisions to its Florida Energy Efficiency and Conservation Act (FEECA) rule.

Miami-Dade County has a long history of supporting and implementing policies to improve energy efficiency and reduce greenhouse gas (GHG) emissions from the built environment. The County recognizes the essential role that a robust energy efficiency program can play in our community, especially low-income households. Indeed, efficiency programs can help all our residents and businesses reduce their energy use, save money, create tens of thousands of local family-wage jobs that can't be outsourced, and keep more dollars in the community. Energy efficiency is also directly linked to housing affordability, one of the County's largest challenges, and equity.

Reducing energy use through increasing efficiency is a core approach in the previous GreenPrint Plan and our forthcoming Climate Action Strategy.

Miami-Dade County is pleased to offer the following recommendations related to the key topics identified for discussion at the May 18, 2021, FEECA workshop.

1. Low Income Energy Efficiency Programs

In the Miami metro area 57% of low-income households face an energy burden that is two or three times higher than other households. This is especially true for low-income households with older adults or people with disabilities. This means that for our most vulnerable community members, energy expenses often compete with other needs like housing, food, and healthcare. This finding is also underscored by recent research by the American Council for an Energy Efficiency Economy (ACEEE) which found that the overwhelming majority of single-family and multifamily low-income households, minority households, and renting households experience higher energy burdens than the average household in the same city.

Importantly, energy efficiency implementation has been demonstrated to be a crucial tool for alleviating high energy burdens, improving housing affordability, and lifting people out of poverty. According to ACEEE, bringing housing stock up to the efficiency of the median household would eliminate 35% of the excess energy burden experienced by low-income households and for multifamily low-income households. For African American, Latino, and renting households, 42%, 68%, and 97% of their excess energy burdens, respectively, could be eliminated by raising household efficiency to the median level.

For all these reasons, we recommend that the Commission take immediate steps to ensure that energy efficiency offerings for low-income and high energy burden Floridians are strengthened and expanded. Specifically, we recommend that the Commission:

- Establish energy savings goals and minimum spending requirements for low-income programs.
- Exempt low-income energy efficiency programs from cost-effectiveness screening and/or develop cost-effectiveness rules that reflect the additional benefits that low-income programs deliver, for example by instituting a 25% non-energy benefits adder that is applied to low-income customer programs.
- Direct Florida's utilities to convene a stakeholder collaborative/advisory board to coordinate and optimize energy efficiency offerings. And,
- Direct utilities to review and propose best practice programs recognized nationally for innovation and performance for serving low-income and multi-family ratepayers, including but not limited to the "exemplary" programs identified by ACEEE's *Four National Review of Exemplary Energy Efficiency Programs*.

2. Energy Efficiency Cost Effectiveness

As the Commission considers revisions to its FEECA rule, we urge you to address the core policy issues causing Florida to lag behind the rest of the country when it comes to energy efficiency. Specifically, no other state in the country relies as heavily on the Rate Impact Measure (RIM) test to evaluate energy efficiency programs. Similarly, no other state in the country requires energy efficiency programs to demonstrate a return on investment in two years or less. Both of these practices caused Florida's utilities to propose zero or near-zero goals for energy efficiency during the prior FEECA goal-setting process.

For these reasons, we urge the Commission to:

- Use standard practice tests like the total resource cost test (TRC) or the Utility Cost Test (UCT) to evaluate the costs and benefits of energy efficiency in place of the RIM test.
- Eliminate the "two-year payback screen" to evaluate energy efficiency investments and use other standard practice tests to measure cost-effectiveness.
- Incorporate "adders" as part of energy efficiency cost-effectiveness analyses in order to account for the many non-energy benefits that energy efficiency delivers such as avoided utility environmental compliance costs, reduced air pollution, and participant health benefits — among others.

Thank you for the opportunity to provide input on this rulemaking. We stand ready to assist in any way that we can. Should you wish to reach us, please contact James Murley, Chief Resilience Officer, at James.Murley@miamidade.gov or 305-375-4811.

Sincerely,



James F. Murley
Chief Resilience Officer
Miami-Dade County