

Antonia Hover

From: Antonia Hover on behalf of Records Clerk
Sent: Tuesday, June 14, 2022 3:17 PM
To: 'meg@southeastcdn.org'
Cc: Consumer Contact
Subject: FW: Public Comment, SSDN, for Docket No. 20220000 (2022 Utility Ten Year Site Plans
Attachments: SSDN Comment Letter on 2022 TYSPs .pdf

Good Afternoon, Meg Jamison.

We will be placing your comments below in consumer correspondence in Docket No. 20220000, and forwarding them to the Office of Consumer Assistance and Outreach.

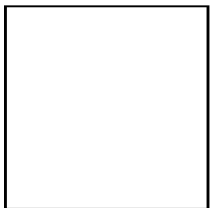
Thank you!

Toni Hover
Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Phone: (850) 413-6467

From: Meg Jamison <meg@southeastcdn.org>
Sent: Tuesday, June 14, 2022 2:31 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Public Comment, SSDN, for Docket No. 20220000 (2022 Utility Ten Year Site Plans

Greetings,
Please place the attached letter in Docket No. 20220000 on behalf of the Southeast Sustainability Directors Network, SSDN.
Thank you for confirming receipt!
Thanks!
Meg

Meg Williams Jamison (she/her)
Executive Director
[2020 Roddenberry Fellow](#)
(Connecting with you from Asheville, NC)



Southeast Sustainability Directors Network
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June 14, 2022

Chairman Andrew G. Fay
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Re: Commission Review of 2022 Electric Utility Ten Year Site Plans

Dear Chairman and Members of the Florida Public Service Commission:

Thank you for the opportunity to provide these comments on the Commission's review of the 2022 electric utility Ten Year Site Plans (TYSPs).

The Southeast Sustainability Directors Network (SSDN) is a network of local governments in the southeastern United States that works together to advance sustainability initiatives in the region. As part of this work, SSDN supports the efforts of more than 60 local Florida governments to:

- Mitigate the environmental, economic, and public health impacts of climate change;
- Build a healthy, sustainable future with more opportunities for economic growth;
- Reduce pollution and improve Florida's air and water quality;
- Protect public health and safety, especially of Florida's most vulnerable citizens; and
- Meet ambitious climate goals.

As you conduct your review of the 2022 electric utility TYSPs, SSDN would like to share information with you about the energy decision-making trends of Florida's local governments. I hope this information provides you with helpful insights about the interests and needs of some of the state's largest energy consumers and their constituents.

Increasingly, local governments in the southeast and in Florida are establishing long-term sustainability goals and advancing sustainability initiatives in order to reduce emissions, scale investment in clean energy, create economic opportunities and jobs, and deliver immediate public health benefits to their residents and businesses. The development and adoption of these goals and initiatives is typically informed by public hearings and workshops, direct engagement with local stakeholders, and inventories and assessments that identify the opportunities, strategies, and pathways to achieve more sustainable outcomes.

Goals commonly adopted by local governments include:

1. Greenhouse gas (GHG) emissions reduction targets for a city or county's operations;
2. GHG emissions reduction targets for a city or county's entire community;¹
3. Energy efficiency goals; and
4. Renewable energy goals.

For instance, many local jurisdictions are adopting goals to achieve:

- Carbon neutrality or a specified level of GHG emissions reduction for their community or city operations by a target date (e.g., 30% GHG emissions reduction by 2030); and
- 100% renewable energy for their community or city operations by a target date (e.g. to power 100% of city operations with renewable energy by 2050).

Additionally, many municipalities are establishing GHG inventories to measure and report the emissions of their entire communities and/or their local government operations; are increasingly adopting social equity goals, or establishing offices of equity and inclusion, as part of their sustainability platforms in order to address the needs of frontline community members; and are increasingly leveraging their sustainability initiatives to build community resilience to disasters (e.g., via climate vulnerability assessments and resilience plans).

Notably, SSDN conducts an annual survey of its members to track the adoption rate of these goals and initiatives.² The results of our recent member survey reveal that a majority of our local government members have adopted GHG mitigation targets and are measuring and reporting their GHG emissions. Indeed:

- 62% of SSDN members have adopted a GHG mitigation target for their city or county operations;
- 40% of SSDN members have adopted a GHG mitigation target for their community;
- 73% of SSDN members are measuring and reporting GHG emissions for their city or county operations; and
- 45% of SSDN members are measuring and reporting GHG emissions for their community.

In order to deliver upon these goals, local governments are prioritizing numerous strategies, including the following efforts:

- They promote energy efficiency within their communities including in residences, multifamily buildings, and commercial spaces;
- They install solar arrays where land and roof space allows and strive to implement energy efficiency first in their own operations in order to reduce the upfront cost of renewable energy implementation;

¹ A "community" goal is for the community as a whole and could include a jurisdiction's residential, transportation, and commercial sectors, etc. as defined by the local government.

² In any one year, Florida cities and counties represent 30%-40% of SSDN's membership.

- They support programs that expand access to renewable energy, including community solar offerings; and
- They work to support the adoption of electrified transport in their communities and in their own fleets.

Despite these robust efforts, local governments are often constrained in how much they can do to drive down their total GHG emissions footprint since they have little to no direct ability as customers to choose the sources of energy that power Florida's electricity grid. As such, cities and counties have a keen interest in finding ways to systematically improve the overall emissions performance of the grid's generation portfolio.

SSDN members are aware that this issue is typically examined in other states through a robust integrated resource planning process. In general a robust integrated resource planning process is a useful tool for local governments and other stakeholders to engage with their utility regulators and service providers to gain insights into the long-term plans for the electricity system; understand the key environmental, social, reliability, cost, and risk factors that shape decision-making; identify opportunities to achieve lower overall system costs; leverage relevant partnership opportunities; and foster dialogue. While such a process does not currently exist in Florida, SSDN and its members are interested in the TYSPs as a means to work towards better generation planning decisions that reflect the energy preferences of Florida's local communities.

Accordingly, I am pleased to present the attached list of questions for you to consider as you evaluate the suitability of each utility's TYSP. I hope these questions provide some additional perspective on the interests of local governments as it relates to their utility service providers.

Thank you for your consideration of my comments. I welcome the opportunity to discuss this more and share additional information as appropriate. I also welcome any opportunity to facilitate meetings directly with you and FL local governments.

Please do not hesitate to contact me at 423-416-0839 with any questions.

Respectfully,



Meg Jamison
Director
Southeast Sustainability Directors Network
meg@southeastsdn.org

Questions for the Public Service Commission to Consider as It Evaluates the Suitability of the 2022 TYSPs

1. An increasing number of large energy users, including local governments, are setting commitments to power their operations and communities with 100% renewable energy and/or carbon-free electricity; enable transportation electrification; and invest in energy efficiency. How have these commitments and preferences for clean energy been accounted for in each TYSP?
2. To what extent will the implementation of each TYSP expose customers to gas price volatility now and in the future? Do the resource decisions proposed in each TYSP increase or decrease this exposure risk? What steps can be taken to mitigate this risk?
3. Do the gas price forecasts and related sensitivities incorporated in each TYSP capture the full range of recent gas costs?
4. To what extent will the implementation of each TYSP expose customers to the risk of future stranded assets? What steps can be taken to mitigate this risk?
5. Does each TYSP maximize investment in least-cost energy efficiency and demand response across all customer segments in order to reduce total energy costs for all customers?
6. What load forecasting techniques, assumptions, and sensitivities have been used by each utility in its TSYP? How do these practices compare with similarly situated utilities?
7. Does each utility's load forecast clearly and accurately delineate energy saving contributions by customer segment, sector, and strategy, including from building energy codes, appliance standards, energy benchmarking, building performance standards, and previously-implemented energy efficiency programs in order to ensure that each utility is fully accounting for the impacts of the demand side management resource?
8. As it relates to winter peak demand, to what extent are the lessons learned from the 2021 Texas power crisis applicable or not to the Florida power system? What underlying data supports these conclusions? What are the trade-offs and related costs of winterizing the power grid? Who should bear those costs? What is the risk of a prolonged extreme winter weather event in FL?
9. To what extent will implementation of each TYSP make progress toward the achievement of 100% carbon-free electricity by 2050?
10. Has each utility proposed an optimal planning reserve margin? What strategies, such as reserve sharing, have been evaluated as means to reduce customer costs while

ensuring grid reliability?

11. What electric vehicle (EV) penetration rates does each utility expect over the next 5-to-10 years? How are these penetration rates impacted by various levels of policy and program interventions? What are the energy demand and load effects associated with these various projections/scenarios? How do these projections model and account for travel behavior, charging behavior, and spatially explicit EV penetration scenarios, including the effects rate designs and the penetration of Levels 1, 2, and 3 charging, and the timing of such charging? How can we leverage EVs as a possible grid resource with vehicle-to-grid (V2G) or vehicle-to-building interoperability and what opportunities exist for electricity load management associated with V2G technologies?
12. How does the level of detail of each utility TYSP compare with the integrated resource plans filed by similarly situated utilities in other jurisdictions, including by Duke Energy Carolinas in North Carolina and South Carolina? What is the process by which these plans are developed? What opportunities exist to learn from these examples to enhance stakeholder engagement and information sharing as a component of future TYSP development?