



MONICA CEPERO, County Administrator

115 S. Andrews Avenue, Room 409 • Fort Lauderdale, Florida 33301 • 954-357-7354 • FAX 954-357-7360

June 15, 2022

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

**Re: FPL Ten Year Site Plan Comments; Docket No. 20220000**

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

Broward County recently became aware that Florida Power & Light (FPL) is seeking approval of an extreme winter weather (i.e., cold weather) peak demand forecast as part of its 2022 Ten Year Site Plan, with a purported demand increase of 40% above the business-as-usual method. As a major ratepayer ourselves, and on behalf of the two million residents and tens of thousands of businesses of Broward County, we urge you to find this forecast "unsuitable" and require FPL to use a "business-as-usual" resource planning method.

FPL's extreme winter weather peak demand forecast is unsuitable for multiple reasons.

1. The methodology FPL used to develop this forecast is unclear, and most alarmingly, the forecast lacks any reasonable analysis of the probability of a winter storm as severe as that used in the forecast. According to James F. Wilson, Principal of Wilson Energy Economics, who presented on behalf of the Southern Alliance for Clean Energy and Vote Solar, FPL's proposal "does not follow standard industry practices."
2. The forecast projects a demand 40% above the business-as-usual forecast, and as James F. Wilson noted, "what are the appliances that could suddenly add over 9,000 MW?" Unlike residents of cold winter climates, Floridians do not maintain an inventory of electric space heaters or the like in the unlikely event of a deep freeze.
3. FPL's proposed solution takes the utility, and the state, backwards, not only by keeping gas plants open that would otherwise have been retired, but also adding 700 MW of gas peaker plants. The Federal Energy Regulatory Commission made many recommendations in the wake of the 2021 Texas winter event, but adding additional generation capacity was not among them. Retaining or even adding gas plants is unwise, given the potential price volatility of fossil gas (well-illustrated by current events) and what is known about the urgent need to cut carbon pollution to preserve a stable climate.
4. Costs—estimated by FPL to reach \$450 million for transmission and distribution upgrades alone—do not seem likely to produce commensurate benefits. To paraphrase

James F. Wilson, building plants that are likely to be used one day every 30 years would not be a sound investment of ratepayer funds.

5. It is widely demonstrated that energy efficiency is the cheapest means of making more energy available, approximately one-third or less the cost of a new source of electricity supply. Rather than incentivize the construction of unnecessary infrastructure which provides utilities an additional guaranteed rate of return, energy providers should be encouraged to invest in robust energy conservation programs to generate this additional capacity, alongside renewable energy investments. Florida simply cannot accommodate additional investment decisions that saddle ratepayers with antiquated energy solutions, and at the expense of environmental goals and aggressive energy conservation strategies better aligned with the public interest.
  
6. Finally, the County believes it appropriate to acknowledge the parallel between energy and water planning challenges and strategies. Nearly 15 years ago there was a push for water utilities in the southeast Florida to expand capacity to meet a stated 20-year projection for an additional 100 million gallons per day in water demand. The region responded with aggressive water conservation strategies that have produced and sustained a 23% reduction in water demand. This effort, coupled with innovation in water management strategies, has avoided the inordinate cost of redundant capital infrastructure and imposed operational costs, instead providing extensive water, energy, and cost savings enjoyed by both utilities and consumers. We urge Florida energy providers to practice this same prudence with judicious management of existing sources and to emphasize conservation strategies as the first, preferred, and most affordable means of making more energy available for ratepayers across the service area while avoiding unnecessary and permanent cost burdens. The most distinction between these water and energy decisions is that, in the case of water, conservation commitments avoided cost escalations where local officials would have been held accountable, whereas with energy providers, and FPL's proposal, conservation remains unaddressed absent the obligation of direct vetting and accountability to these same ratepayers.

For these reasons, we urge you to find FPL's extreme winter weather peak demand forecast as "unsuitable" and require use of the business-as-usual forecast instead.

Please do not hesitate to contact me if you have any questions about this letter.

Yours sincerely,



Monica Cepero  
County Administrator

CC: Broward County Board of County Commissioners