

Lorena Hollett

From: Lorena Hollett on behalf of Records Clerk
Sent: Monday, November 14, 2022 12:59 PM
To: 'Leila Sujanani'
Cc: Consumer Contact
Subject: RE: Make utilities maximize energy efficiency!

Good afternoon, Leila Sujanani.

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.

Regards,

Lorena Hollett
Commission Deputy Clerk I
Florida Public Service Commission
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From: Leila Sujanani <ljsujanani@gmail.com>
Sent: Saturday, November 12, 2022 9:49 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Make utilities maximize energy efficiency!

Dear PSC Commissioners,

I'm a college student who is angry about the lack of action on climate.

I was disappointed to see that the current draft for the rules to implement the Florida Energy Efficiency and Conservation Act (FEECA), the statute in Florida which was designed to improve energy resiliency through energy efficiency improvements, makes no meaningful changes to its last version. This is desperately needed, as under the current version all of Florida's utilities currently rank close to dead last for energy efficiency in the nation.

Not improving energy efficiency will mean two things for Floridians: devastating effects on public health and preventing economic growth.

The effects Floridians currently face and will increasingly face in the next 15 years from climate change include increasing extreme heat, stronger hurricanes, sea level rise, significant flooding of our coasts, and higher rates of mosquito- and tick-borne illnesses. This is well documented, and more information, particularly on extreme heat and its health effects for Floridians, can be found on the Florida Clinicians for Climate Action website at <https://www.floridaclinicians.org/>. This is a group of over 500 healthcare professionals in the state dedicated to educating other health professionals and the public on the current severe and increasing effects climate change is having on health, particularly in Florida.

Improving energy efficiency is one of the cheapest and most effective ways we can reduce the burning of fossil

fuels and decrease the devastating effects of climate change on human health. Since climate solutions are health solutions, energy efficiency will also improve health by reducing pollution in our air, exacerbations and overall incidence of chronic diseases like asthma, acute diseases like stroke, healthcare costs, utility bills, and money flowing out of our state to purchase gas that could instead be spent within local economies.

On top of being a health and economic issue for our state, this is an environmental justice issue. All Floridians are affected by our lack of effective energy efficiency regulations on utilities, but the most vulnerable – people on fixed incomes, low-income, and BIPOC communities - are disproportionately affected. Those living in rental properties are often excluded from or overlooked by energy efficiency programs which are needed in older, more inefficient buildings. All of these communities spend a higher percentage of their income for wasted energy and have little to no resources to improve energy efficiency where they live. The real repercussions of this are Floridians having to make the choice between running their air conditioning in the brutal heat or being able to afford food or medications to treat their medical conditions. It's an impossible choice, and one that always results in worsened health and increased healthcare costs for Floridians.

While our state's utilities are making record profits, they continue to push for big bill increases on Floridians. Floridians are already being crushed under the \$60 billion our utilities already spend annually on methane fossil gas and then pass through to their customers. Florida could have avoided so many of the recent methane plant builds (and subsequent rate increases) in recent years had energy efficiency been optimized in the state. Florida needs to improve energy efficiency now to prevent this vicious cycle from continuing.

To improve energy efficiency in Florida, I am calling on you, the PSC, to make the following key updates to the FEECA rules:

1. Remove the Ratepayer Impact Measurement (RIM) Test from the cost/benefit analysis of FEECA. No other utility regulation in our nation primarily relies on such a test in its state because it is outdated, illogical, and allows utilities to exclude almost any energy efficiency program from being implemented, as it treats the success of energy efficiency programs FEECA is meant to create (lower electricity sales) as a cost. It therefore overestimates costs and undervalues efficiency to make a determination of what is “cost effective”, rather than what is actually cost effective to the purposeful beneficiaries of FEECA - Floridians. Utilities would benefit from removal of the RIM test as well, as the resulting overall reduction in energy needs and peaks would reduce stress to the grid and improve its resiliency.
2. Remove the 2-year payback test for exclusion of consideration of total technical energy efficiency saving possibilities that could be made in Florida. This is meant to cancel free ridership, but the 2-year payback screen does not have any merit for several reasons. By excluding technologies that pay for themselves in 2 years from the base of opportunities that are available, Florida utilities' current practice is dramatically reducing from consideration what opportunities there are in Florida to improve energy efficiency. They are also excluding the cheapest technologies that are the most effective opportunities for improving energy efficiency in the state quickly. The technologies excluded by the 2-year payback screen are also the most likely to affect people most disproportionately affected by energy efficiency equity issues, that is, the people most deserving, but least able to afford these upgrades. It is also unfair that utilities get to then count these technologies towards their implementation goals after they exclude them from initial estimates of possible improvements. No other state sandbags their energy efficiency efforts with a 2-year payback screen and it's time for Florida to catch up.
3. Specifically focus on rental property energy efficiency improvements when calculating energy efficiency potential for the state. Tenants and Landlords have little reason to invest in energy efficiency programs as they would not likely benefit from the energy bill savings they would create, and often do not have resources to do so.
4. Target or incentivize implementation of utility energy efficiency programs to tenants of rental properties and

for people living in predominately Low- and Moderate-Income communities.

5. Set reasonable goals for energy efficiency for Florida utilities. Zero energy efficiency, such as that proposed by FPL during the last round of proposed goals, is a slap in the face to Floridians. The goals ultimately set in the last round, although technically above zero for each utility, were far, far below the national average, with total energy savings of annual retail sales for 2020 ranging from 0.03% to 0.33% for different Florida utilities, compared to the national average of 0.72%. At the very least, we should be meeting the national average here in Florida.

6. Enforce the goals set to improve energy efficiency programs for Florida utilities. Even the low goals set by the most recent FEECA proceeding were not met by FPL or Duke Energy, without repercussions.

For more information on why improvements to FEECA are needed, please refer to this Opinion editorial recently published in the Orlando Sentinel. Even municipal utilities like the Orlando Utility Commission (OUC) are increasing rates at record highs this year with no accountability for their decisions to invest in fossil gas plants instead of efficiency programs, so OUC, like FPL and Duke, are amongst the lowest performing utilities in the nation when it comes to offering conservation measures to their customers.

Enough is enough. Please fight for human health, Florida's economy, and her citizens. Floridians, and the rest of the nation, are watching.

Sincerely,

Leila Sujanani