

Dear Ms. Cowdery,

Thank you for the opportunity to comment on and provide recommendations to the Florida Public Service Commission on proposed federal regulation of carbon dioxide from existing power plants under section 111(d) of the Clean Air Act (the Clean Power Plan).

It is my understanding that the PSC will continue to accept and review comments submitted after today's deadline, but that, given the October 15 deadline to submit comments to EPA, the PSC requests that stakeholders submit comments at the earliest possible date. I am therefore writing today on to provide the attached preliminary comments behalf of NextGen Climate America, which will be followed by more detailed technical comments next week.

The Public Service Commission's comments to the United States Environmental Protection Agency (EPA) on the Clean Power Plan should indicate that Florida is in a strong position to meet the emissions reduction targets EPA has proposed for the state. These targets represent a significant reduction in Florida's carbon pollution emissions, and they are readily achievable through existing cost-effective technology and well-established policy mechanisms.

In addition to focusing on Florida's in-state energy mix, the State can best to develop a state plan that will allow it to implement the Clean Power Plan at lowest cost and with the full cooperation of Floridian stakeholders. We therefore recommend a number of measures that will facilitate inter-agency coordination and stakeholder input. We ale recommend that the state begin discussions with potential partners for a multi-state plan as soon as possible.

Regardless of whether Florida plans to submit an individual state plan or participate in a multi-state plan, DEP will be required to submit at least preliminary version of its plan by June 30, 2016. If the state is considering any forms of multi-state cooperation, it must begin discussions with potential state partners as soon as possible in order to be prepared to submit a preliminary plan and memorandum of understanding by EPA's deadline.

Once again, we thank you for this opportunity to comment, and we will submit more detailed comments as soon as possible.

David Weiskopf

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