



## PRELIMINARY COMMENTS ON BEHALF OF NEXTGEN CLIMATE AMERICA TO THE FLORIDA PUBLIC SERVICE COMMISSION ON THE CLEAN POWER PLAN

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).

This document provides preliminary comments behalf of NextGen Climate America, which will be followed by more detailed technical comments at a later date.

NGCA is a non-partisan, non-profit organization dedicated to creating a level playing field so that low-carbon advanced energy solutions can fairly compete with incumbent fossil fuel interests. Launched in 2014, we develop and promote policies to prevent climate disaster and preserve American prosperity. We are committed to supporting innovative leadership at the state level that will help to end the unlimited dumping of pollution into our atmosphere and further the implementation of commonsense national safeguards to protect the health, environment, and economy for current and future generations.

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.

Many of the steps that Florida should consider for the sake of promoting the economic, health, and environmental benefits of a strong in-state clean energy sector will also have the added benefit that they will reduce carbon pollution from the state's power sector and help the state meet or exceed the forthcoming Clean Air Act requirements. For this reason, Florida should seek to achieve the bulk of the required reductions by tapping into the state's vast reservoir of untapped potential for energy efficiency, and by taking advantage of Florida's excellent renewable energy resources. Our preliminary analysis indicates that Florida can achieve all or virtually all of its compliance obligations through a combination of programs that pursue levels of energy efficiency and renewable energy that are on consistent with its resource base and on par with the goals of many of Florida's peer states.

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. To facilitate this outcome the state should take the following steps:

1. Convene new or existing inter-agency working groups, chaired by the Department of Environmental Protection (DEP), should be convened on a



regular basis to coordinate on Clean Power Plan state plan development. This working group should include representatives from DEP, the PSC and its staff, the Governor's Office, and other relevant government agencies.

2. DEP, either individually or in coordination with the inter-agency working group, should schedule regular open meetings for public input on the plan. DEP should also schedule a series of small group or individual meetings with stakeholders from communities and groups focused on environmental protections, public health, economic justice, emerging industries, renewable energy, energy efficiency, and other relevant issues, in addition to regulated industry.
3. DEP and other workgroup members should attend workshops and other meetings with their counterparts in neighboring states, with the aid of a professional facilitator, to discuss the possibility of developing a multi-state compliance plan and/or joining the existing Regional Greenhouse Gas Initiative (RGGI) as a component of the state plan.

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.

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