



**ENVIRONMENTAL PROTECTION and GROWTH MANAGEMENT DEPARTMENT
ENVIRONMENTAL PLANNING and COMMUNITY RESILIENCE DIVISION**

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September 3, 2014

Ms. Kathryn Cowdery
Office of the General Counsel
Florida Public Service Commission
Via Email

Dear Ms. Cowdery,

Thank you for the opportunity to provide comments on the US Environmental Protection Agency's proposed Clean Power Plan to the Florida Public Service Commission.

Broward County has a long history of leadership on climate and energy issues. Along with Miami-Dade, Monroe, and Palm Beach counties, its partners in the four-county Southeast Florida Regional Climate Change Compact, it has called for comprehensive federal legislation to address greenhouse gas emissions, as well as federal and state policies supporting clean energy, energy efficiency, increased transportation options, and sustainable growth.

Most recently, on June 24, the Broward County Board of County Commissioners unanimously adopted a resolution offering general support for the proposed Clean Power Plan and directing county staff to submit detailed comments to the US EPA.

Seeking to lead by example, the Board also adopted a goal earlier this year for Broward County to achieve a 20 percent reduction in building electricity use by 2020 and to power 20 percent of its operations with renewable energy.

We believe that Florida, as the state most vulnerable to the effects of sea level rise, must also lead by example. It should seek not just to meet, but to exceed the goals proposed in the Clean Power Plan. It should do this first by reducing electricity demand as much as possible through vigorous energy efficiency efforts, and then by meeting as much of the remaining demand as possible through nonpolluting sources of energy, especially solar photovoltaic energy.

Energy efficiency is, by far, the cheapest "source" of energy, and by its nature, contributes directly to lower carbon emissions. Many states have made incredible strides in reducing their electricity consumption through increased efficiency. Broward County believes the PSC could provide a stronger leadership role in this regard by establishing meaningful energy-efficiency goals for our

energy utilities (expressed in a December 18, 2013, letter from Mayor Barbara Sharief). It is unfortunate to have lost this opportunity in the 2014 FEECA proceedings, as this would have provided the least expensive, most impactful way of meeting the Clean Power Plan goals.

The second chief strategy for meeting the Clean Power Plan goals should involve significant expansion of renewable energy resources, particularly solar power. Expanding the share of electricity generated by solar power in Florida will have numerous benefits: reducing Florida's dangerous dependence on fuel imports, better grid security and resilience, creation of numerous local solar installer and maintenance jobs, additional capacity at the times of heaviest demand (i.e. sunny, hot afternoons), lower pollution (not just carbon dioxide, but also particulates and other pollutants generated by fossil fuel burning, many of which cause serious public health impacts), and a reduced need for extremely expensive central power plants, the cost of which is borne by ratepayers.

A state plan that relies upon the transition from coal to natural gas offers an incomplete solution, as it continues to lock the state into decades of continued carbon emissions at a time when global emissions should be reduced as much as possible to reduce the risk of severe climate impacts. Nuclear power may have role in providing carbon-free base-load generation, but siting concerns and cost issues pose challenges. A large expansion of nuclear energy therefore seems unlikely.

Many commentators have warned that the Clean Power Plan will impose dramatic costs on the American economy. However, we are already aware that the cost of doing nothing is far greater, exceeding the capacity of local communities and our economy.

Broward County believes that the U.S. businesses, including electric power producers, can and will meet the goals established in the Clean Power Plan using our country's trademark resourcefulness and ingenuity. The Florida Public Service can advance these efforts by establishing policies that support solar energy and energy efficiency, the two most important strategies for achieving the Clean Power Plan goals in Florida while furthering energy independence and economic opportunities within our communities and throughout the state.

Please do not hesitate to contact me should you have any questions regarding this letter.

Yours sincerely,



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Broward County