

Mark Futrell
Florida Public Service Commission

September 12, 2007

Submitted electronically

RE: Staff RPS Workshop on August 23, 2007

Dear Mark,

Enclosed please find for filing comments submitted on behalf Regenes Power, LLC.

I have a concern for businesses operating the a sale of energy business that uses solar energy to produce electricity sold at retail prices and delivered behind the customers meter.

I understood that that selling electricity to a customer in Florida is only done by a regulated electric utility. I am sorry I do not have the specific law or rule that backs up this but I had researched it years ago and was told by the Office of General Council at JEA that was the case.

This excludes a company like ours or anyone else wishing to sell the electricity from a solar system in the State of Florida. Our company as well as others in the US have found this a significant factor in being able to deploy large systems on customers sites.

In discussion with knowledgeable industry professional we would suggest the following:

Emphasis is needed to make high levels of distributed generation renewable energy. More important, the sector needs the certainty of no-intervention to make that kind of investment.

Stipulate that retail sales are only allowed from certain types of DG (eg: PV only, etc)

Remind all & incorporate language acknowledging that any retail customer of a utility presently has the right (within the interconnection rules) to lease, build, buy, rent, etc the capital equipment, as well as the "fuel" and other variables. There is no operational difference between a "performance-indexed lease" and retail sales of output.

As a reminder to all, no other technologies but renewables can compete economically with utility-scale generation. Otherwise, every large customer out there would already have an on-site power plant (like they did in the 30s & 40s, when utility plants were small and very high cost).

I want to thank you and your colleagues for the good work you are doing for all of us here in Florida.

Sincerely,

Dell Jones

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Dell Jones
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