



Lee Eng Tan
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Office of the General Counsel
Florida Public Service Commission

Re: Request for Comments on Solar Energy in Florida

Pursuant to a request for comments on solar energy in Florida issued on April 23, 2015, CARE submits the following comments for your consideration.

The Citizens Alliance for Responsible Energy is devoted to educating the public about the need to guarantee our access to the affordable energy that drives our nation forward. We work with policy makers to ensure that energy policy ensures our freedom and prosperity while taking common sense measures to protect our environment.

All policies looking to address Florida's energy future must take into consideration the impact those policies will have on energy affordability and reliability. They must also consider all potential impacts to electric ratepayers. In other states, CARE has seen solar energy policies developed with a single energy consumer in mind, as opposed to the overall customer base that pays to maintain the energy grid.

To the credit of the Florida Public Service Commission, regulators, to date, have acknowledged the need to balance the desires of those who wish to 'go solar' with the need to protect customers-at-large from higher rates or other negative consequences. We believe the Florida Public Service Commission should continue to ensure that one set of customers, particularly those with low incomes, are not being asked to subsidize another set of customers who install rooftop solar panels. Net metering above avoided costs creates a subsidy and is harmful to consumers.

It is also important to recognize that while renewable energy sources will play a larger role going forward, they are not likely to contribute significantly to meeting growing demand. Regulators should make customers aware of solar power's limited contribution to the grid and to emphasize the complementary role that solar power is intended to play alongside traditional energy sources, which are capable of operating without interruption. Customers in Florida, like customers across the U.S., have grown accustomed to a high degree of reliability from their power providers and deserve to be accurately informed about the limitations of solar power to meet demand—particularly during peak periods.

In addition, experience has shown that anti-market solar policies have resulted in negative consequences for customers. My white paper, entitled [Solar Power in the US: Lessons Learned and Guidance for Policy Makers](#), outlines a number of challenges that have arisen due to the rapid increase of solar power in the past decade. These challenges include the heavy use of taxpayer dollars to subsidize solar's high costs. Consumers have also fallen prey to fraud by unscrupulous solar companies that arise to take advantage of those subsidies. Numerous safety and maintenance issues have also gone overlooked in the rush to solar, as have impacts on the reliability of the power grid and cost shifts from solar users to non-solar users.

The fact remains that solar still competes poorly with traditional energy fuels like coal, natural gas and nuclear, and only appears comparable when heavily subsidized or mandated by government policies. Creating an environment where energy sources can compete freely on their own merits is a good thing. However, establishing policies that will create subsidies or mandates for any one energy resource will create artificial markets incapable of sustaining themselves. In the end, this hurts electric customers and throws the energy marketplace out of balance to the detriment of all those who pay for it.

I encourage the Florida Public Service Commission to make "responsible" energy choices—those that are efficient, effective, and economical.

If my comments or testimony can be helpful in a future hearing, please let me know.

Sincerely,

Marita Noon
Executive Director