

THE FLORIDA RETAIL FEDERATION'S COMMENTS REGARDING ENCOURAGEMENT OF SOLAR ENERGY IN FLORIDA

Submitted to The Florida Public Service Commission
June 23, 2015

The Florida Retail Federation (“FRF”) appreciates the opportunity to submit these comments to the Florida Public Service Commission (“PSC”) concerning the enhanced development of solar technologies in Florida. In summary, the FRF strongly supports the expanded development of solar and other renewable energy technologies in Florida as a means of bolstering Florida’s economy, reducing the outflow of Floridians’ money to pay for imported electric generating fuels, protecting Florida and Floridians against fuel cost volatility, improving Florida’s energy independence and long-term economic sustainability, and preserving and creating jobs for Floridians.

The Florida Retail Federation. Founded in 1937, the FRF is a statewide organization of more than 9,000 members, including the largest chains of grocery stores, department stores, appliance retailers, pharmacies, and other retailers, as well as thousands of small businesses and sole proprietorships. The FRF’s members need safe, adequate, reliable, and reasonably priced electric service to conduct their businesses and to serve their customers. Of equal importance, the FRF’s members, like all citizens and businesses in the State, need a healthy, sustainable Florida economy.

Background. Florida is the third largest state in the Nation (estimated per July 1, 2014). Floridians’ electricity usage in 2014 was approximately 241,000 gigawatt-hours (“GWH”), which is approximately 241 billion kilowatt-hours (“kWh”). The State’s electricity consumption is projected to grow to approximately 270 billion kWh by 2023. 2014 Regional Load & Resource Plan, Florida Reliability Coordinating Council, July 2014, page S-18 (Form 9.1).

Florida’s Energy Dependence. Of this tremendous amount of electricity consumed in 2014, only 1.6 percent (3,832 GWH of a total of 240,744 GWH) was provided from renewable energy resources, and only 0.1 percent (262 GWH, one-tenth of one percent of the total) was provided from solar resources. These simple statistics demonstrate Florida gross dependence on imported electric generating fuels: Florida imports more than 98 percent of the fuels that it uses to generate electricity. As amply demonstrated by historical energy supply disruptions and price spikes, from the 1973 Oil Embargo to the dramatic price increases in the price of natural gas experienced in 2008, this leaves Florida vulnerable to future disruptions and price spikes.

Of equal or greater significance, this also means that Floridians continue to send their hard-earned dollars outside the state to purchase these imported fuels. This means

that Floridians have less to spend on other goods and services, obviously including those goods and services that would be produced by their fellow citizens. In other words, Florida's energy dependence translates into jobs that could and should be in Florida, but are not.

Promoting Solar Technologies. The FRF agrees with many other commenters that promoting and encouraging the implementation of solar technologies is important to Florida's economic health. (The same is generally true of other renewable energy technologies.) This is true for both demand-side and supply-side solar technologies. Promoting solar and other renewables will keep money in Florida, and will preserve and create jobs for Floridians both in the solar/renewable energy sectors and in all sectors and industries as Floridians have more disposable income to spend at home.

To promote and encourage demand-side solar technologies, the State and the PSC should preserve customers' access to net metering, and they should adopt policies that promote customers' ability to utilize solar technologies.

To promote and encourage supply-side solar technologies, the PSC should follow its general precept that it is to serve as a surrogate for competition: competition in the supply of solar facilities means real competition, whether administered by the utilities or by the PSC, in order to ensure that the State, and all of its citizens and electric customers, get the lowest-cost solar installations available in a free, competitive market.

Summary. In summary, Florida must promote additional solar development to protect the State and her economy from energy cost fluctuations, to promote the State's energy independence, to ensure a healthy and sustainable economy that is not vulnerable to supply disruptions and price spikes, and to preserve and create jobs for Floridians.

The FRF deeply appreciates the opportunity to submit these comments, and the Commission's consideration of these comments and the important policy issues facing the State.