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Florida Public Service Commission 2540 Shumard Oak Drive Tallahassee, Florida 32399

The Space Coast Progressive Alliance (SCPA) thanks the Commission for the opportunity to express our views on solar policy in Florida. SCPA's mission is to promote progressive policies. Our vision for our energy future is maximizing the use of renewable energy, with fossil fuels an ever-decreasing component of the energy mix. To work towards this future, a comprehensive vision for a modernized grid utilizing distributed renewable energy sources, should be put forth for our state, similar to New York State's Reforming the Energy Vision initiative. Florida with its high solar energy potential (http://energy.gov/maps/solar-energy-potential) should have as a fundamental energy resource distributed (rooftop) solar, although solar at all scales – rooftop, community, and utility should be maximized.

Electricity from solar energy has clear and obvious benefits in that it is fuel-free and can be generated on site. Rooftop solar could save consumers money not only as individual households but community-wide, if schools and other government buildings were able to install solar collectors. Rooftop solar has numerous other benefits. It avoids fuel and transmission costs, among others. It could make the energy mix more reliable. It's a new and emerging technology so it would create jobs here in Florida. The environmental benefits are many. It lessens dependence on fossil fuels which means less carbon emissions; less water used to extract the fossil fuels; less water and air pollution from fossil fuel extraction and burning. Utility scale solar eliminates the need for vast amounts of water for cooling with its attendant problems.

Electricity from solar energy is a viable alternative right now. The technology for utilizing it at all scales will only improve. Florida with its solar potential and being home to one of the world's leading technology centers, the Space Coast, could not be better positioned to transform to a resilient, modern grid based on renewable distributed energy sources.

Net metering, adopted by 366.91 (5) Fla. Stat., allows customers who own solar panels to get a credit for excess power produced by their panels which is then applied when they draw power from the grid. This promotes the use of demand-side solar because customers are fairly compensated for their power generation. Net metering is an effective policy to encourage individual consumer investments in solar. It should be continued. Net metering has been portrayed as being unfair to customers that don't have solar. However, most rooftop solar energy is used on site. In addition, traditional utility cost-benefit analysis techniques are not adequate to assess distributed renewable energy because they do not



capture all avoided costs and hard to quantify benefits.¹ Efficient use of resources benefits everyone and we should have in place a system and policies that reflect that.

Solar rebates have been wildly successful in promoting the use of demand-side solar energy systems. Each year this program, which was just eliminated by the Commission in 2014, saw about \$25 million of rebates allocated in matter of minutes. This is a program that succeeded in its goal of promoting demand-side renewable energy. It should be reinstated. This program was also criticized as being unfair to low income people who could not afford a system even with the rebate. When the rebates are reinstated, the program can be restructured according to the current price of a system and it can include a program targeted specifically for low-income consumers, who would benefit greatly from a reduced energy bill. Florida subsidizes many industries. In Brevard County, for example, where the SCPA is located, tens of millions of dollars in tax breaks and incentives have been allocated to the air and space industries. In some ways, it's even more appropriate for solar energy to receive incentives because it is an emerging technology.

Alternative financing of solar would help more people afford solar energy systems. In other states solar companies can design and install a solar energy system for customer on their property at little or no cost. While the customer does not own the system, the power produced from it can be locked in at a long-term fixed rate – providing an economic benefit to the customer. This is being done successfully in many states all over the country, but is currently not allowed by Florida law. Changing this requires Legislative action. Right now, Floridians for Solar Choice is working on a ballot petition to let the voters decide if this alternative financing should be allowed in Florida. SCPA supports the Floridians for Solar Choice ballot initiative.

To encourage supply-side solar energy systems, Florida should set high targets for the generation of energy from renewable sources, along with goals for energy efficiency. Both of these would drive investment in solar at all scales, because solar is efficient and renewable.

Across the country and in Florida people support renewable energy

(http://environment.yale.edu/poe/v2014/). SCPA, because of its mission, supports policies that take a long-term view and are focused on empowering citizens and communities to forge a sustainable, equitable and healthy future. Solar energy is something Floridians want as evidenced not only by surveys, but by the success of the rebate program and the support the Floridians for Solar Choice amendment has already received. The commission should do everything in its power to support the public interest and not have policies, processes or decisions dominated by corporations that enjoy the privileged status of legal monopolies. Investment in solar, other renewable energy sources and a modern grid is an investment in a better future for Florida citizens.

¹ Benefit-Cost Analysis for Distributed Energy Resources, prepared for the Advanced Energy Economy Institute by Synapse Energy Economics, Inc., September 22, 2014.