

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Analysis of IOUs' Hedging Practices

Docket No. 170057

Filed: April 10, 2017

SIERRA CLUB'S  
PETITION TO INTERVENE

Pursuant to Sections 120.569, 120.57, Florida Statutes (F.S.), and Rules 25-22.039, 28-106.201, and 28-106.205 Florida Administrative Code (F.A.C.), Sierra Club hereby petitions for leave to intervene in the above captioned docket and states:

1. Agency's name and address. The affected agency is the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850.
2. Petitioner's name and addresses. Petitioner is Sierra Club with the following headquarters and local addresses:

Sierra Club, National Headquarters  
2101 Webster Street, Suite 1300  
Oakland, CA 94612  
415-977-5500

Sierra Club, Florida Chapter  
1990 Central Avenue  
St. Petersburg, FL 33712  
727-824-8813

3. Petitioner's representatives. Copies of all notices, pleadings, orders and other communications in this docket should be directed to:

Zachary M. Fabish  
Staff Attorney  
Sierra Club  
50 F Street, NW, Eighth Floor  
Washington, DC 20001  
202-675-7917  
zachary.fabish@sierraclub.org

Steven J. Goldstein  
Legal Fellow  
Sierra Club  
50 F Street, NW, Eighth Floor  
Washington, DC 20001  
202-650-6064  
steve.goldstein@sierraclub.org

4. Notice of docket. Petitioner received notice of this docket through participation in a February 21, 2017, workshop and by reviewing the Commission's website.
5. Statement of substantial interest. This Petition is on behalf of Sierra Club and its more than 30,000 members who live and purchase electric utility service in Florida, many from Florida Power & Light, Duke Energy Florida, Tampa Electric Company, and Gulf Power. Declaration of Nachy Kanfer, Mar. 2, 2017, ¶ 3 (hereinafter Kanfer Decl.) (attached as Exhibit A); Declaration of Huda Fashho, Mar. 2, 2017, ¶ 6 (hereinafter Fashho Decl.) (attached as Exhibit B).
6. Sierra Club is a national non-profit organization. Kanfer Decl. ¶ 3; Fashho Decl. ¶ 2.
7. Sierra Club and its Florida members are dedicated to reducing pollution through public health and environmental safeguards, and through the rapid transition away from fossil fuel burning electricity generation. Kanfer Decl. ¶ 4. To achieve this transition, Sierra Club has championed policies to remove barriers to energy efficiency, solar power, wind power, and storage. Kanfer Decl. ¶ 4. These are low-cost low-risk alternatives to generating electricity from fossil fuels. Sierra Club advocates for such policies and regulations nationwide, including in Florida, by intervening, submitting comments, providing testimony, and presenting experts in state and federal energy-related proceedings; participating in public hearings and workshops; speaking to students, civic organizations, and other stakeholders; and holding seminars and symposia – all to ensure that clean energy solutions reach every community. Kanfer Decl. ¶ 4.
8. This docket concerns the process by which Florida's major utilities address market volatility for natural gas prices. Both the current and proposed practices authorize these companies to purchase future supplies of natural gas at a set price, locking in their reliance on natural gas instead of investing in renewable electricity, energy efficiency, or storage.
9. The Commission's review will include – but is not limited to – three issues. First, whether it is in the consumers' best interest for the utilities to continue natural gas financial hedging activities? Second, what changes, if any, should be made to the manner in which electric utilities conduct their natural gas financial hedging activities? And, third, if changes are made to the conduct of natural gas hedging activities, what regulatory implementation process is appropriate?
10. Sierra Club meets the standing requirements to intervene in this docket.

11. First, Sierra Club meets the three-prong associational standing test established in Florida Home Builders v. Department of Labor and Employment Security, 412 So.2d 351 (Fla. 1982), which was later extended to hearings involving disputed issues of material fact under Section 120.57(1), F.S. in Farmworker Rights Organization, Inc. v. Department of Health and Rehabilitation Services, 417 So.2d 753 (Fla. Dist. Ct. App. 1982). Under this test, an association has standing to litigate on its members' behalf when: (a) the association demonstrates that the Commission's decision may substantially affect a substantial number of its members; (b) the subject matter of the proceeding is within the association's general scope of interest and activity; and (c) the relief requested is of a type appropriate for the association to receive on its members' behalf. Florida Home Builders, 412 So.2d at 353.
12. Sierra Club meets the associational standing test's first prong because a substantial number of its members are affected by the use and structure of natural gas hedges. The practices adopted here will continue to affect its members' electric bills and their ability to receive low-cost, low-risk resources. Florida's customers, including many Sierra Club members, have lost more than \$6.5 billion from hedging since 2001. The Commission's decisions will also substantially affect electricity services provided to these members by locking in further natural gas reliance and forestalling the transition to clean renewable generation, energy efficiency, and storage. Kanfer Decl. paragraph 5; Declaration of Lesley G. Blackner, Feb. 23, 2017 ¶¶ 8-10 (hereinafter Blackner Decl.) (attached as Exhibit C); Declaration of David Harbeitner, Mar. 2, 2017 ¶ 5 (hereinafter Harbeitner Decl.) (attached as Exhibit D); Declaration of Sandra Lynn Adams, Mar. 1, 2017 ¶ 8 (hereinafter Adams Decl.) (attached as Exhibit E); Declaration of Wesley Kent Bailey, Mar. 1, 2017 ¶ 7 (hereinafter Bailey Decl.) (attached as Exhibit F).
13. Sierra Club meets the associational standing test's second prong as well. Sierra Club is interested in, and actively advocates for, a rapid transition away from fossil fuel burning generation, toward low-cost, low-risk, clean energy alternatives. Kanfer Decl. ¶ 5. These measures ensure that Sierra Club members have access to low-cost electricity that is provided with less risk to human health and the environment than that which accompanies the use of fossil fuels. Blackner Decl. ¶ 11; Harbeitner Decl. ¶ 7; Adams Decl. ¶ 6; Bailey Decl. ¶ 4. Continuing financial hedging will expose ratepayers to a greater risk of hedge losses and remove an important incentive for the utilities to transition to zero-fuel renewable and energy efficiency alternatives.
14. Sierra Club meets the associational standing test's third prong because it seeks a resolution that will accurately reflect the benefits of integrating renewables, energy efficiency, and storage on ratepayer exposure to volatility in natural gas markets.
15. Additionally, Sierra Club meets the two-prong test for administrative standing established in Agrico Chemical Company v. Department of Environmental Regulation, 406 So.2d 478 (Fla. Dist. Ct. App. 1981) rehearing denied, 415 So.2d 1359 (Fla. 1982). This test requires (a) an injury in fact of sufficient immediacy to entitle the petitioner to a hearing

under Section 120.57 F.S.; and (b) substantial injury of a type or nature that the proceeding is designed to protect.

16. Sierra Club meets the Agrico test's first prong because the use of mechanisms to control the risk of natural gas price spikes has affected and will continue to impact its members' monthly electric bills. Harbeitner Decl. ¶ 5; Adams Decl. ¶¶ 5, 7; Bailey Decl. ¶¶ 9, 12; Blackner Decl. ¶¶ 9, 12. Additionally, financial hedging incentivizes the Independently Owned Utilities ("IOUs") to continue to rely on natural gas for electricity generation. Sierra Club's members support diversifying away from a natural gas dominant portfolio through the use of renewables, energy efficiency, and storage. Harbeitner Decl. ¶¶ 7, 9; Adams Decl. ¶¶ 6-7; Bailey Decl. ¶ 10; Blackner Decl. ¶ 11.
17. Sierra Club meets the second prong because this proceeding is designed to protect all ratepayers, including Sierra Club members, from imprudent hedging practices that lead to unreasonable fuel costs as compared to the market price for natural gas.
18. Sierra Club's intervention will not unnecessarily broaden the issues or unduly delay this proceeding because Sierra Club's interest is directly related to the subjects addressed in the proceedings, and because Sierra Club and its members will "take the case as they find it." Rule 25-22.039 F.A.C.
19. Sierra Club anticipates that disputed issues of material fact include but are not limited to: whether financial hedging is in the best interest of consumers; what, if any, changes should be made to current practices if the Commission allows the utilities to continue to manage risk from volatile natural gas markets; and what would be the appropriate regulatory implementation process for these risk management devices moving forward.
20. Statement of ultimate facts. Sierra Club reserves the right to identify ultimate facts after completing discovery in this proceeding.
21. Statement required by Rule 28-106.204(3), F.A.C.. Sierra Club conferred with all parties of record and its undersigned representative is authorized to represent that the parties take no position on this motion at this time.
22. WHEREFORE, Sierra Club respectfully requests that the Commission enter an order granting it leave to intervene in the above captioned docket, and further requests parties to provide the undersigned with all notices, pleadings, testimony, discovery, and other communications filed in the docket.

RESPECTFULLY SUBMITTED this 10th day of April, 2017

/s/ Zachary M. Fabish

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steve.goldstein@sierraclub.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served electronically on this 7th day of April, 2017 on:

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sbrownle@psc.state.fl.us

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*/s/ Zachary M. Fabish* \_\_\_\_\_  
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# **EXHIBIT A**



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Analysis of IOUs' Hedging Practices

Docket No.: 170057

Filed: <sup>April 19</sup> ~~March~~, 2017

**DECLARATION OF NAHALIEL ("NACHY") KANFER**

I, Nahaliel ("Nachy") Kanfer, declare that the following statements are true and correct to the best of my knowledge, information, and belief, and are based on my personal experiences and my review of publicly available information:

1. My name is Nachy Kanfer, and I am of legal age and competent to give this declaration.
2. I am a Sierra Club employee. I serve as the Deputy Director (East Region) for Sierra Club's Beyond Coal Campaign. I am responsible for ensuring that all of Sierra Club's state-based teams in the East Region successfully execute the campaign's goals. I supervise five employees who each manage project teams and/or other employees throughout the thirteen states in the campaign's East Region, including Florida. I regularly interact with dozens of employees and volunteers as part of my job responsibilities.
3. Sierra Club is a national non-profit membership organization. The Florida chapter of Sierra Club has over 30,000 members, including many who are customers of Duke Energy Florida, Gulf Power, Florida Power and Light, and the Tampa Electric Company.
4. Sierra Club and its Florida members are dedicated to reducing pollution through public health and environmental safeguards, and through the rapid transition away from fossil fuel based electricity to clean, low-cost, and low-risk energy resources. Sierra Club advocates for such policies nationwide including in Florida, by intervening, submitting comments, providing testimony, and presenting experts in state and federal energy related proceedings. We also participate in public hearings and workshops, speak to students, civic organizations and

stakeholder groups, and hold seminars and symposia, all to ensure that clean energy is made available to all communities.

5. Sierra Club members have a substantial interest in promoting clean, low-cost, and low-risk energy resources that provide stability and reductions to their monthly electric bills. To protect these interests, Sierra Club has participated in workshops concerning natural gas fuel hedging and filed to intervene in the present docket. Allowing Florida’s major utilities to continue to hide the costs of their risky overreliance on natural gas behind complicated financial mechanisms would result in a direct, concrete harm to Sierra Club’s members’ substantial interests by continuing to tie their monthly utility bills to an inherently volatile fuel market.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Cincinnati, Ohio on March 2, 2017.

Nahaliel (“Nachy”) Kanfer



CHRISTINA LOPEZ  
Notary Public, State of Ohio  
My Commission Expires 10-17-2021

3-2-2017

**EXHIBIT B**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Analysis of IOUs' Hedging Practices

Docket No. 170057

Filed: ~~March~~ <sup>April 10</sup> 2017

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DECLARATION OF HUDA FASHHO

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I, Huda Fashho, declare as follows:

1. My name is Huda Fashho, and I am of legal age and competent to give this declaration. All information herein is based on my own personal knowledge unless otherwise indicated.
2. Sierra Club is a non-profit membership organization.
3. I am Sierra Club's Member Care, Associate Director. I have held this position for five years.
4. As Member Care, Associate Director, I manage Sierra Club's customer service functions for members, including maintaining an accurate list of members and managing Sierra Club's member databases.
5. When an individual becomes a Sierra Club member, his or her current residential address is recorded in our membership database. This database entry reflecting the member's residential address is verified or updated as needed.
6. The Sierra Club currently has over 30,000 members throughout Florida.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in San Francisco, California on March 2, 2017.

  
Huda Fashho

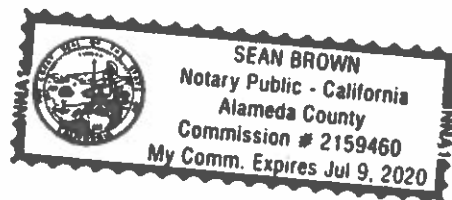
STATE OF CALIFORNIA

COUNTY OF Alameda

BEFORE ME, the undersigned authority, personally appeared Huda Fashho who is personally known or produced as identification, and who was sworn and says that the foregoing averments are true.

Sworn to and subscribed before this 2 day of March, 2017.

  
Notary Public



## **EXHIBIT C**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Concerning Natural Gas Financial  
Hedging for Electric Utilities

Docket No.:

Filed: March 10, 2017

**DECLARATION OF SIERRA CLUB MEMBER  
LESLEY G. BLACKNER**

I, Lesley G. Blackner, declare that the following statements are true and correct to the best of my knowledge, information, and belief, and are based on my personal experiences and my review of publicly available information:

1. My name is Lesley G. Blackner, and I am of legal age and competent to give this declaration.
2. I live at 123 Australian Avenue, Palm Beach, Florida 33480. I have lived at this address for twenty years and I have no plans to move. I also purchased a second home in 2014 that I am currently renovating at 609 South Beach Road, Jupiter Island, Florida 33469.
3. I am a customer of Florida Power and Light Company at both of my residences and have been a FPL customer for over twenty years.
4. I have been a member of the Sierra Club since May 2005. I joined Sierra Club because I am concerned with the effects of human actions, and particularly the use of fossil fuels for electricity generation, on the environment. I appreciate Sierra Club's work to protect the environment and transition our country to clean energy.
5. I am concerned about the environmental impacts of using natural gas for electricity generation. Generating power from natural gas requires extracting, transporting, and burning natural gas with damage to the environment at each step in the process. Because I live in a coastal community I am particularly concerned about the contribution of natural gas to climate change and sea level rise.

6. I fully support Sierra Club's involvement in PSC proceedings involving fuel price volatility and the associated market risk to customers of Florida's utilities.

7. As a ratepayer I am concerned about FPL's over reliance on natural gas. This overreliance exposes me to greater risk from a volatile fuel market. I have incurred, and will continue to incur, extra costs as a result of this over use of natural gas.

8. I am also aware that FPL has taken steps to insulate itself from excessive volatility in the natural gas market, and that these steps have resulted in a significant loss to its customers. .

9. I have noticed that my utility bill remains high even when natural gas prices are at all-time lows. This affects my ability to invest in further energy efficiency measures for my houses.

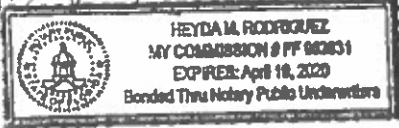
10. The risk from market volatility is largely a function of FPL's overreliance on natural gas and I am concerned that the company has done little to address this issue.

11. I support the transition to clean, low cost, low risk alternatives to natural gas. These sources provide electricity without the risk of a volatile fuel market. As such, I believe that I would benefit from greater investment in renewables rather than a continued heavy reliance on natural gas.

12. I understand that the Sierra Club has engaged in workshops concerning natural gas fuel prices. Depending on the outcome of these workshops and subsequent proceedings I may once again be exposed to the losses associated with natural gas hedges. This is an imminent and substantial harm to me as an FPL customer with no plans to move, and no ability to opt out of buying FPL's electricity.



I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Palm Beach, Florida on this 23 day of February, 2017.

*Heyda M. Rodriguez*  
A rectangular notary seal stamp for Heyda M. Rodriguez. It features a circular emblem on the left with a scale of justice and the words 'NOTARY PUBLIC' and 'FLORIDA'. To the right of the emblem, the text reads: 'HEYDA M. RODRIGUEZ', 'MY COMMISSION # FF 92831', 'EXPIRES: April 18, 2020', and 'Bonded thru Notary Public Underwriters'.

*Lesley G. Blackner*  
Lesley G. Blackner

## **EXHIBIT D**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Analysis of IOUs' hedging practices

Docket No. 170057

Filed: ~~March~~ <sup>April 19</sup>, 2017

**DECLARATION OF SIERRA CLUB MEMBER  
DAVID HARBEITNER**

I, David Harbeitner, declare that the following statements are true and correct to the best of my knowledge, information, and belief, and are based on my personal experiences and my review of publicly available information:

1. My name is David Harbeitner, and I am of legal age and competent to give this declaration.
2. I reside at 225 9<sup>th</sup> Ave North, St. Petersburg, Florida 33701, and have done so since June 2012. I have been a Duke Power customer continuously since I moved into this residence. Additionally I own a separate residence on our St Petersburg property (an alley apartment, 225 1/2 9th Ave N) which is also serviced by Duke. I also own coastal property on Anna Maria Island.
3. I am an active Sierra Club member and first joined in November 2013. I have been a lifelong environmentalist, and upon moving to Florida, I searched for an opportunity to more actively engage in environmental issues confronting the state. Particularly, I wanted to uphold the bipartisan conservation efforts that had previously been established in Florida and engage at both a grassroots and political level. The Sierra Club provided a proactive forum for these goals. Since joining, I have been the political chair for the Sierra Club Suncoast Group, and I likewise am a member on the legislative advisory committee for the Florida Chapter of the Sierra Club.

4. My daughter is a PhD candidate in marine biology, which has allowed me to be acutely aware of the scientific facts of climate change and man's impact on the earth. This exposure has increased my level of knowledge and interest in climate change issues.

5. I currently work as a Certified Financial Planner and am well aware of the inherent risks associated with hedging practices and understand it is a common tool for companies reliant on natural resources. I am further aware of the fact that Duke Power had engaged in fuel hedging for more than a decade, and as a result, despite the drop in natural gas prices, ratepayers in Florida had to pay approximately \$1.4 billion to recover their failed hedging bets.

6. Before moving to Florida, I lived in Maryland and had decision making power over my choice of utility provider. Consequently, I opted for a provider that solely generated its electricity from wind power. In the regulated state of Florida, however, I do not have a choice of utility provider and therefore I am very concerned about the financial practices and the environmental impacts of Duke Power, the provider I am required to use.

7. I have become very concerned about Duke Power's approach towards handling ratepayers, recovery fees, and their lack of proactive action to allow for development of a renewable energy profile in Florida. I am concerned by their increase in use of natural gas as the new alternative for a failed nuclear energy scheme, and their overall disregard of a cleaner, solar energy solution. I personally am a supporter of cleaner, solar energy, and I have installed solar panels on all of our properties in order to promote this sustainable, clean energy resource.

8. I am very concerned about the environmental harm cause by Duke Power's continued over-dependency on natural gas. The impacts on climate change, such as sea level rise and increased storms/flooding, would directly impact the coastal property I own on Anna Maria

Island.

9. I also would like to see options considered that allow for energy efficiency. I have invested in numerous energy efficiency solutions in all of my properties, such as energy efficient windows and additional insulation.

10. I support Sierra Club's intervention in PSC proceedings involving fuel price volatility and the associated market risk to customers of Florida's utilities. I am aware that the Sierra Club has been engaged in workshops and proceedings concerning natural gas prices, and depending on the outcome of this engagement, I may be vulnerable as a ratepayer to losses associated with natural gas fuel hedging. This would provide substantial economic harm to me as a Duke Power customer.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in St. Petersburg, Florida on March 2, 2017.



\_\_\_\_\_  
David Harbeitner

STATE OF FLORIDA

COUNTY OF Pinellas.

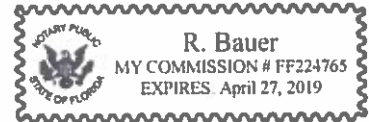
BEFORE ME, the undersigned authority, personally appeared

David A Harbeitwer who is personally known or produced  
FL DL HG13161621080 as identification, and who was sworn

and says that the foregoing averments are true.

Sworn to and subscribed before this 2<sup>nd</sup> day of March, 2017.

R. Bauer  
Notary Public



# **EXHIBIT E**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Analysis of IOUs' hedging practices

Docket No. 170057

Filed: March <sup>April</sup> 10, 2017

**DECLARATION OF SIERRA CLUB MEMBER  
SANDRA LYNN ADAMS**

I, Sandra Lynn Adams, declare that the following statements are true and correct to the best of my knowledge, information, and belief, and are based on my personal experiences and my review of publicly available information:

1. My name is Sandra Lynn Adams, and I am of legal age and competent to give this declaration.
2. I reside at 6746 East Bay Blvd., Navarre, FL 32566, and have done so for the past 4 years. I have been a Gulf Power customer for approximately 18 years in total.
3. I am a Sierra Club member. I first joined in April 2002 and am currently an active member. I joined because I truly love and care about the environment and want to do everything I can to help protect and preserve it. I have always enjoyed nature and wildlife and I believe that climate change is one of our country's greatest concerns. I want the planet to be habitable for future generations. I think we need to be doing everything possible to minimize carbon emissions and avoid the worst impacts of climate change.
4. I work as a psychologist with my own private practice. Outside of work, I spend much of my time engaging in activities to help protect the environment. I am a member of several other environmental organizations in addition to the Sierra Club.
5. I fully support Sierra Club's involvement in PSC proceedings involving fuel price volatility and the associated market risk to customers of Florida's utilities. As a Gulf Power




customer. I am very concerned about the company's overreliance on natural gas and am concerned that the company will continue to rely on dirty, higher-cost, and higher-risk fossil fuels, and pass those costs and risks onto customers like me.

6. As a coastal property owner, I am particularly concerned about Florida's continued overreliance on fossil fuels because of their impact on the climate and environment. My house is located 50 feet from the shore and is vulnerable to damage from sea level rise, increased flooding, and hurricanes. I would like to see cleaner energy options be fully considered in Florida, especially as a state with huge potential for solar energy build out.

7. I also would like to see options considered that allow for energy efficiency. I have first-hand experiences with the value of energy efficiency measures, as I have installed them in my own home. For example, in my home I have installed energy-saving technologies such as solar panels on our roof, geothermal heating and air conditioning, spray-in insulation, a tank-less gas water heater, and standard energy efficient appliances.

8. Again, I support Sierra Club's intervention in this proceeding. I am aware that the Sierra Club has been engaged in workshops and proceedings concerning natural gas prices, and depending on the outcome of this engagement, I may be vulnerable as a ratepayer to losses associated with natural gas fuel hedging. This would provide substantial economic harm to me as a Gulf Power customer.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in NAASDALE, Florida on March 1, 2017.

  
\_\_\_\_\_  
Sandra Lynn Adams

STATE OF FLORIDA

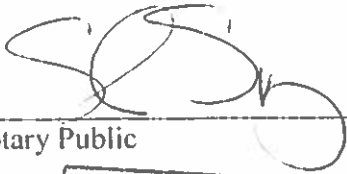
COUNTY OF Santa Rosa.

BEFORE ME, the undersigned authority, personally appeared

Sandra Lynn Adams who is personally known or produced  
FLDLA352792589580 as identification, and who was sworn

and says that the foregoing averments are true.

Sworn to and subscribed before this 1 day of March, 2017.



Notary Public



## **EXHIBIT F**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Concerning Natural Gas Financial  
Hedging for Electric Utilities

Docket No.:

April 10  
Filed: March 3, 2017

**DECLARATION OF SIERRA CLUB MEMBER  
WESLEY KENT BAILEY**

I, Wesley Kent Bailey, declare that the following statements are true and correct to the best of my knowledge, information, and belief, and are based on my personal experiences and my review of publicly available information:

1. My name is Wesley Kent Bailey, and I am of legal age and competent to give this declaration.
2. I live at 15012 Highway 301, Thonotosassa, Florida 33592 in Hillsborough County. I have lived at this address for thirty five years and I have no plans to move.
3. I am a customer of the Tampa Electric Company (TECO) and have been a TECO customer for over thirty five years.
4. I chair the Tampa Bay Group of Sierra Club's Florida chapter and have been a Sierra Club member since 2001. I joined Sierra Club because I am concerned with the effects of human actions, and particularly the use of fossil fuels for electricity generation, on the environment. I support Sierra Club's work to protect the environment and transition our country to clean energy.
5. I am aware that there is currently a glut of natural gas on the market, that this has caused prices to rest on the low end and that that has spurred greater investment in natural gas for electricity generation.
6. I stay informed of environmental and energy issues through a number of online newsletters and by reading the St. Petersburg Times.

7. I am concerned about the environmental impacts of using natural gas for electricity generation. Generating power from natural gas requires extracting, transporting, and burning natural gas with damage to the environment at each step in the process. I am concerned that the process of burning natural gas in the Tampa area will exacerbate the drawdown of our local aquifers and that the continued use of natural gas will contribute to climate change.

8. As a resident of Hillsborough County, I am concerned that the money I pay to TECO is contributing to these environmental problems.

9. As a ratepayer I am concerned that relying on natural gas exposes me to a volatile fuel market. While TECO has done little to protect me from these risks, I have taken steps to improve the energy efficiency of my home and reduce my exposure to consistently high electricity prices.

10. I support the transition to clean, low cost, low risk alternatives to natural gas. These sources provide electricity without relying on unpredictable fuel supplies. As such, I believe that I would benefit from greater investment in renewables and energy efficiency rather than a continued heavy reliance on natural gas. I have invested in energy efficiency improvements at my home including R54 ceiling insulation and new energy efficient windows.

11. I support Sierra Club's involvement in this PSC proceeding.

12. I understand that Sierra Club participated in workshops concerning hedging and that this docket is a continuation of those discussions. If utilities are allowed to continue with business as usual I would continue to be exposed to unnecessary risk from their overreliance on natural gas. This is an imminent and substantial harm to me as a TECO customer with no plans to move, and no ability to opt out of buying TECO's electricity.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Hollywood, Florida on this 1 day of March, 2017.

Wesley Kent Bailey  
Wesley Kent Bailey

Trisha Skipper  
3-1-17

