

In re: Petition by Florida Power & Light Company
for Approval of One-Year Extension of Voluntary
Solar Partnership Rider and Program

Docket No. 2017 _____

Filed: October 2, 2017

**Petition by Florida Power & Light Company for One-Year
Extension of Voluntary Solar Partnership Rider and Program**

Florida Power & Light Company (“FPL” or “the Company”) pursuant to Section 366.075, Florida Statutes (2017), petitions the Florida Public Service Commission (“Commission”) for approval of a one-year extension of the Company’s Voluntary Solar Partnership Rider and Program¹ through December 31, 2018. In support, FPL states:

1. The Petitioner’s name and address:

Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408

2. FPL requests that any pleading, motion, notice, order or other document filed or submitted in this proceeding be served upon the following individuals:

Kenneth A. Hoffman
Vice President, Regulatory Affairs
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215 S. Monroe Street, Suite 810
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Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
(561) 304-5795
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3. In this petition, FPL seeks a one-year extension of its Voluntary Solar Partnership (“VSP”) Rider and Program, which offers all FPL customers an opportunity to contribute voluntarily toward the construction and operation of small-scale solar photovoltaic generation

¹ The VSP Rider and Program is known to FPL customers as “SolarNow®.”

facilities located in communities throughout FPL's service territory. This community-based pilot program has been successful thus far and has experienced remarkable, unexpected participation growth in the past year. Because, in practical terms, the program will not have completed three full years of active operation until mid-next year, a one-year extension of the tariff and pilot period will allow FPL to gather additional data regarding the durability of customer interest over a more substantial period of time and, most importantly, evaluate the potential for a separate optional community shared solar tariff the Company is developing.

VSP Rider and Program

4. By Order No. PSC-14-0468-TRF-EI dated August 29, 2014 ("Order 14-0468"), the Commission approved FPL's VSP Rider and Program, as reflected on Original Tariff Sheet No. 8.930, as a three-year pilot that expires December 31, 2017. Because FPL's conventional generating system is highly efficient, the costs of distributed solar energy generation currently exceed the projected fuel and environmental benefits for customers – in other words, small-scale, community-based solar generally is not cost-effective in FPL's service area. In recognition of the benefits derived by siting smaller solar installations in local communities and the importance of advancing clean solar energy through education, the VSP Program was designed as a way to overcome this cost-effectiveness barrier. The program offers all FPL customers the option of contributing \$9.00 per month to support the construction and operation of small-scale solar facilities in local communities. Participation is entirely voluntary, and participants may unsubscribe at any time with no penalty. Participant contributions are intended to cover the net costs (revenue requirements minus fuel and emissions savings) so that non-participants are not required to subsidize the higher cost of the facilities. The purpose of the pilot period was to allow FPL to gather information regarding customer participation and the operation of the

program in order to determine the appropriate direction thereafter. Under Order 14-0468, FPL would report on the data gathered at the end of the three years.

5. FPL began planning its initial solar generation sites for the VSP Program during the latter part of 2014. Consistent with Order 14-0468, those efforts began prior to receipt of any contributions. Although the program was approved to begin January 1, 2015, enrollment was not opened until May 1, 2015, due to the time necessary to establish the tariff in FPL's billing system. Consistent with Order 14-0468, FPL has capped its annual marketing and administrative expenses during the pilot period at a maximum of 20 percent of participant contributions.

6. The Program experienced moderate participation during the first 12 months after enrollment began in May 2015. In July 2016, FPL implemented adjustments to improve the online enrollment process, which facilitated significant, unexpected growth in participation. As of August 31, 2017, a total of 22,705 customers were enrolled in the program, a level that far exceeds even the "high participation" illustrative projection filed with FPL's original petition.

7. Following the enrollment growth that began in July 2016, FPL diligently mobilized efforts to locate additional sites for the construction of solar assets to adequately match participant contribution levels. The Company secured commitments from various communities throughout FPL's territory (known as "host sites"). While each host site has its own set of requirements and preferences, the completed and planned VSP Program installations comprise a diverse set of assets, including ground-mount structures, rooftop installations, covered walkways, parking canopies and interactive tree-like structures. Commensurate with the current and forecasted customer participation levels in the program, FPL has 42 projects completed, under construction, or ready for construction that total 1,752 kW_{DC}. FPL projects

that the participant revenues, at the current and forecasted participant levels, will fully cover the associated net revenue requirement (revenue requirements minus system benefits).

Future Community Shared Solar Program

8. In light of the strong interest customers have shown for participating in solar generation and the Company's demonstrated ability to build large-scale solar facilities cost-effectively, FPL is developing and intends to present a community shared solar program² for Commission approval within the next year. The new program is being designed to provide another voluntary solar option for customers that also will not require subsidization by non-participants. It is anticipated that the program will offer FPL customers the option to purchase a block or multiple blocks of capacity from cost-effective, large scale solar generation facilities. The new program will have some attributes that are similar to the VSP Program, with several key differences. FPL expects the program's final design will, like VSP, not require customers who participate to be bound to a long-term contract or commitment nor subject participants to any enrollment administrative fees or termination penalties. Unlike VSP, the community shared solar program would provide participants with a direct credit on their electric bills associated with the block(s) of solar-generated capacity that they purchase. Over time, these bill credits would be expected to offset a customer's participation cost, resulting in a net bill reduction for a participant. Other obvious differences between the VSP Program are that VSP comprises smaller educational and interactive solar intentionally located in high-visibility urban areas in order to increase solar awareness among the general public. The community shared solar

² Community shared solar is defined by National Renewable Energy Laboratory (NREL) as a solar-electric system that provides power and/or financial benefit to multiple community members; A guide to community Shared Solar: Utility, Private, and Nonprofit Project Development.

program, by contrast, will involve solar facilities that are far larger than those that can be built as part of VSP because this type of program is focused more on generating long-term savings, utilizing the economies of scale available to large-scale solar generation, rather than promoting solar awareness and education.

One-Year Extension

9. FPL requests a one-year extension of the VSP Rider and Program. This will allow FPL to continue to evaluate the future of VSP by gathering more substantial data regarding the durability of customer interest and the long-term viability of the program. Equally important, the extension will allow FPL time to evaluate the potential of its anticipated community shared solar offering. This will help FPL make specific recommendations to the Commission regarding VSP and finalize the design of the future community shared solar option.

10. Attached as Exhibit A is Revised Tariff Sheet 8.930, which sets forth the terms of participation in the extended VSP Program in both legislative and clean formats. As reflected therein, the terms are identical to those set forth in Original Tariff Sheet 8.930, with changes only to the Tariff's effective date and the expiration date, which is changed from December 31, 2017 to December 31, 2018.

WHEREFORE, for the reasons stated above, FPL respectfully requests that the Commission approve Revised Tariff Sheet No. 8.930 and extend the VSP Program for one year,

through December 31, 2018.

Respectfully submitted this 2nd day of October 2017.

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By: s/ Maria J. Moncada
Maria J. Moncada
Florida Bar No. 0773301

EXHIBIT A

VOLUNTARY SOLAR PARTNERSHIP RIDER
(OPTIONAL PILOT PROGRAM)

RATE SCHEDULE: VSP

AVAILABLE:

In all territory served by FPL (“the Company”) to customers receiving service under any FPL metered rate schedule. This voluntary solar partnership pilot program (“VSP Program”, “the Pilot”) provides customers an opportunity to participate in a program designed to construct and operate commercial-scale, distributed solar photovoltaic facilities located in communities throughout FPL’s service territory. Service under this rider shall terminate December 31, 2018, unless extended by order of the Florida Public Service Commission (“FPSC”), or terminated earlier by the Company upon notice to the FPSC.

APPLICATION:

Available upon request to all customers in conjunction with the otherwise applicable metered rate schedule.

LIMITATION OF SERVICE:

Any customer under a metered rate schedule who has no delinquent balances with the Company is eligible to elect the VSP Program. A customer may terminate participation in the VSP Program at any time and may be terminated from the Pilot by the Company if the customer becomes subject to collection action on the customer’s service account.

CHARGES:

Each voluntary participant shall agree to make a monthly contribution of \$9.00, in addition to charges applied under the otherwise applicable metered rate schedule. Customer billing will start on the next scheduled billing date upon notification of service request. The VSP Program contribution will not be prorated if the billing period is for less than a full month.

Upon participant’s notice of termination, no VSP Program contribution will be assessed in the billing period in which participation is terminated.

TERM OF SERVICE:

Not less than one (1) billing period.

SPECIAL PROVISIONS:

Upon customer request, program participation may continue at a new service address if the customer moves within FPL’s service territory.

RULES AND REGULATIONS:

Service under this rider is subject to orders of governmental bodies having jurisdiction and to the currently effective “General Rules and Regulations for Electric Service” on file with the Florida Public Service Commission. In case of conflict between any provisions of this schedule and said “General Rules and Regulations for Electric Service” the provisions of this rider shall apply.

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