

**Antonia Hover**

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**From:** Antonia Hover on behalf of Records Clerk  
**Sent:** Monday, March 2, 2020 1:41 PM  
**To:** 'meg@southeastssdn.org'  
**Cc:** Consumer Contact  
**Subject:** FW: Public Comment, the Southeast Sustainability Directors Network, for Docket 20190061 (Commission review of Petition for approval of FPL SolarTogether program and tariff)  
**Attachments:** Comments from SSDN on SolarTogether for FL PSC March 2 2020.pdf

Good Afternoon, Ms. Jamison:

We will be placing your comments below in consumer correspondence in Docket Number 20190061 and forwarding them to the Office of Consumer Assistance and Outreach.

Thank you!

*Toni Hover*  
Commission Deputy Clerk I  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399  
Phone: (850) 413-6467

**From:** Meg Jamison <meg@southeastssdn.org>  
**Sent:** Monday, March 2, 2020 12:22 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Public Comment, the Southeast Sustainability Directors Network, for Docket 20190061 (Commission review of Petition for approval of FPL SolarTogether program and tariff)

Good Afternoon,

Please place the attached letter in Docket No. 20190061.

Thanks!  
Meg

**Meg Williams Jamison**  
Network Director | Southeast Sustainability Directors Network (SSDN)  
[www.southeastssdn.org](http://www.southeastssdn.org) | Follow us! @theSSDN

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March 2, 2020

Chairman Art Graham  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

Re: Commission review of Petition for approval of FPL SolarTogether program and tariff, Docket No. 20190061

Dear Chairman and Members of the Florida Public Service Commission:

**Thank you for the opportunity to provide these comments on Florida Power and Light's (FPL) SolarTogether program.**

The Southeast Sustainability Directors Network (SSDN) is a network of local governments in the southeastern United States that works together to advance sustainability initiatives in the region. As part of this work, SSDN supports the efforts of more than 40 local Florida governments to:

- Mitigate the environmental, economic and public health impacts of climate change in Florida,
- Build a healthy, sustainable future with less toxic pollution threatening the state's residents and more economic growth opportunities for workers,
- Improve Florida's air and water quality,
- Protect public health, especially of the most vulnerable, and
- Meet ambitious climate goals.

Community solar is a critical tool to help Florida's city and county governments achieve these outcomes. In addition, municipalities need more community options to expand solar access to their residents and businesses, including renters and those who cannot or choose not to install a solar system due to financial or other reasons. For many of these reasons, several SSDN communities, including West Palm Beach, Broward County, Miami-Dade County, and Palm Beach County have pre-enrolled in the SolarTogether program.

**SSDN encourages the Commission to take steps to approve FPL's SolarTogether program including important program provisions that:**

**1. Provide dedicated opportunities for low-income customers to participate.**

Community solar programs should be designed to expand solar access to all, especially

those who are most vulnerable and who are not served or cannot be served by existing solar policies and markets. By setting aside or expanding the program with a capacity carveout for low-income customers, FPL can take important steps to offer opportunities for its customers in energy poverty to benefit from clean energy investments.

2. **Enable the Renewable Energy Credits (RECs) associated with a participating customer's subscription are automatically retired on that customer's behalf.** The automatic retirement of RECs will enable participating large customers, including municipalities, to meet their sustainability goals without fear of “double counting.”
3. **Incorporate robust, transparent reporting.** FPL is projecting significant program benefits for participating and non-participating customers alike. However, the realization of these benefits will hinge on future fuel prices and carbon regulation, among other uncertainties. Since the program's costs and benefits will impact all of FPL's ratepayers, robust, transparent reporting should be instituted to ensure that the program delivers on its promise, and program adjustments in future phases can be made as necessary.
4. **Ensure future program phases are developed in consultation with local governments.** Community solar is a critical tool to help local governments achieve environmental, economic, and public health outcomes. As additional phases of the SolarTogether program are contemplated, we encourage consultation with local governments. We also recommend potential establishment of a local government carveout so that cities and towns in FPL's service territory have an opportunity to participate as many municipalities have public processes with long lead times to review and approve potential program participation.

**SSDN is encouraged that the proposed settlement agreement incorporates many of these important program attributes.**

I appreciate your consideration of my comments. Please do not hesitate to contact me at 423-416-0839 with any questions.

Respectfully,

Meg Jamison  
Director  
Southeast Sustainability Directors Network  
meg@southeaststdn.org