

Antonia Hover

From: Angie Calhoun
Sent: Wednesday, August 12, 2020 11:43 AM
To: Consumer Correspondence
Cc: Diana Vizcarrondo
Subject: FW: To CLK docket 20200176
Attachments: SSDN Comments to the PSC on Duke's Community Connections Program.pdf

Consumer correspondence for docket 20200176.

Sincerely,

Angela Calhoun
Regulatory Program Administrator
Office of Consumer Assistance & Outreach

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From: Meg Jamison <meg@southeastsdn.org>
Sent: Wednesday, August 12, 2020 9:02 AM
To: Consumer Contact <Contact@PSC.STATE.FL.US>
Subject: Comments Re: Docket No. 20200176 – Petition to Approve Duke Energy’s Clean Energy Connection Program

Dear Mr. Chairman,

Thank you so much for accepting these comments.

We appreciate you considering this important step forward for clean energy in Florida!

Thanks!
Meg

Meg Williams Jamison
Network Director | Southeast Sustainability Directors Network (SSDN)
www.southeastsdn.org | Follow us! @theSSDN
[2020 Roddenberry Fellow](#)

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August 12, 2020

Gary F. Clark, Chairman
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
contact@psc.state.fl.us

Re: Docket No. 20200176 – Petition to Approve Duke Energy’s Clean Energy Connection Program

Dear Chairman and Members of the Florida Public Service Commission:

The Southeast Sustainability Directors Network (SSDN) appreciates the opportunity to provide these comments on Duke Energy Florida’s Clean Energy Connection (CEC) program.

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, including several in Duke’s service territory, to:

- Mitigate the environmental, economic, and public health impacts of climate change;
- Build a healthy, sustainable future with more opportunities for economic growth;
- Reduce pollution and improve Florida’s air and water quality;
- Protect public health and safety, especially of Florida’s most vulnerable citizens; and
- Meet ambitious climate goals.

SSDN recognizes the value of community solar as an important mechanism to deliver upon these outcomes, help municipalities achieve their sustainability goals, and to expand solar access to residents and businesses, especially renters, small businesses, and those who cannot or choose not to install a solar system due to financial or other reasons.

As Duke developed its CEC program, Mr. Lon Huber and Ms. Stacy Phillips, as well as others on their team, engaged proactively with FL city and county representatives and representatives of SSDN to share ideas, solicit input, and hear recommendations and lessons learned from the design and implementation of other community solar offerings across the country, including Florida Power and Light’s SolarTogether program. For example, Duke, SSDN, and city and county sustainability representatives collectively serving 7.1 million Floridians met in-person for a half day in early 2020 to discuss the proposed CEC program design. SSDN and city and county sustainability representatives also provided written comments for Duke’s consideration and shared anonymized city and county feedback on the local government experience with Florida Power and Light’s SolarTogether program.

The goal of these engagements and information sharing was to work collaboratively with Duke to inform a robust program design that would expand solar access; provide meaningful opportunities for low-income consumers to participate; strike an appropriate balance in terms of the cost impacts born by program participants and non-participants; and account for the unique needs and challenges of local governments to evaluate and enroll in the program.

As described below, Duke’s proposed CEC program addresses the input of SSDN and local government representatives in a number of important ways. Specifically, Duke’s program:

1) Incorporates an Enhanced and Expanded Offering for Low-income Floridians

SSDN appreciates Duke’s inclusion of a low-income capacity carveout as part of its program design. 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 a capacity carevout for low-income customers, Duke is taking important steps to ensure participation by vulnerable populations. Additionally, in response to feedback from SSDN and city and county representatives, we are pleased that Duke enhanced its proposed low-income offering by:

- Incorporating a hold harmless provision to ensure that low-income customers do not experience a bill increase in any month as a result of their program participation.
- Increasing its carveout to a level that matches the percentage of Duke’s residential customers at or below 200% of the federal poverty level.
- Coordinating the CEC offering with the marketing of low-income energy efficiency services.

2) Reserves Capacity and Offers an Extended Enrollment Window for Local Governments

Under normal circumstances, cities and counties need a minimum of eight weeks to process a decision with Commissioners or Councilmembers to review, evaluate, and decide whether or not to enroll in a program like the CEC program. With communities currently focused on COVID-19 response efforts, this timeline is considerably longer. In order to ensure that local governments have a fair and equal opportunity to participate in the CEC program, especially during these challenging and uncertain times, SSDN appreciates that Duke proactively reserved a portion of its program’s capacity and extended the program enrollment window for local governments.

3) Incorporates Several Key Provisions to Support the Solar Industry, Including Local Solar Installers

More than 24,000 Floridians are employed by the renewable energy industry.¹ Many of these jobs pay well, are local, and are in hands-on fields like installation so they cannot be easily outsourced. For these reasons, SSDN appreciates that Duke incorporated several program provisions to support local job creation, including the local solar installer community, by agreeing not to introduce a new net energy metering tariff through 2023; committing to utilize competitive solicitation processes to select contractors and procure equipment and materials;

¹E2, Clean Jobs America 2020, <https://e2.org/wp-content/uploads/2020/04/E2-Clean-Jobs-America-2020.pdf>

and to issue competitive requests for proposals open to third parties to perform program construction services.

4) **Improves Upon Comparable Programs Offered by Duke's Peers In Terms of the Share of Benefits that Non-Participants Will Receive**

Local governments are especially attuned to the costs of living for all of their constituents. One of the most significant components of these costs is energy utility bills. For these reasons, SSDN appreciates that Duke improved upon comparable community solar programs offered by its peers in terms of the share of benefits that non-participants will receive. For example, Duke's program will provide a greater share of benefits to non-participants compared with the recently approved SolarTogether program (87% versus 45% of program benefits).

5) **Will Coordinate Program Outreach and Education with Local Governments**

Local governments are uniquely positioned to assist Duke in educating constituents about the CEC program. For example, cities and counties can leverage their listservs, email blasts, community programming, social media channels, and partnerships (including cities' trusted relationships with low income communities and service providers) to help Duke reach residents and small businesses, including low-income community members. SSDN is pleased that Duke is committed to coordinating and collaborating with local governments on community outreach and education if the CEC program is approved by the Commission.

6) **Will Evaluate a Future Resilience Offering** — Resilience to hurricanes, climate change, and sea level rise is imperative for safe, economically productive Florida communities. As a result, Florida's local governments are increasingly focused on ensuring reliable emergency power for the operation of critical government facilities through investments in solar+storage. While Duke's proposed community solar program offers many attractive features, it does not provide direct resilient post-disaster power to critical facilities. As such, SSDN appreciates Duke's willingness to consider inclusion of a resilience offering as part of its future program design.

For all of these reasons, SSDN encourages the Commission to take steps to approve Duke's CEC program including the important program attributes outlined above.

I appreciate your consideration of my comments. Please do not hesitate to contact me with any questions.

Sincerely,

Meg Jamison

Network Director

Southeast Sustainability Directors Network (SSDN)

meg@southeastsdn.org