

Iris Rollins

From: John Plescow
Sent: Monday, August 8, 2022 8:29 AM
To: Consumer Correspondence; Diane Hood
Subject: FW: To CLK Docket 20220000
Attachments: 08.05.22 Letter to Florida Public Service Commission Regarding FPL Ten Year Site Plan Docket 2022000.pdf

Importance: High

Please, add to docket 20220000.

From: Consumer Contact <Contact@PSC.STATE.FL.US>
Sent: Monday, August 08, 2022 8:08 AM
To: John Plescow <JPlescow@PSC.STATE.FL.US>
Cc: Angie Calhoun <ACalhoun@PSC.STATE.FL.US>
Subject: To CLK Docket 20220000
Importance: High

From: Murley, James (RER) <James.Murley@miamidade.gov>
Sent: Friday, August 05, 2022 4:26 PM
To: Consumer Contact <Contact@PSC.STATE.FL.US>
Cc: McCrackine, Sean (Office of the Mayor) <Sean.McCrackine@miamidade.gov>; Murley, James (RER) <James.Murley@miamidade.gov>
Subject: MDC Filing for Public Service Commission - FPL 2022 Ten Year Site Plan Comments
Importance: High

Dear Florida Public Service Commission Members:

The attached comments are being provided on behalf of Daniella Levine Cava, Mayor, Miami-Dade County.

Sincerely,

Jim Murley
Chief Resilience Officer
111 NW 1st Street, 12 Floor
Miami, Florida 33128
(O) 305-375-5593
(C) 786-719-9155

All Lobbyists must register with the Clerk of the Board prior to any meeting with County Personnel. [Register online](#) or in person at 111 NW 1st Street, 17th Floor, Miami, FL 33128. The Clerk's Office phone number is 305-375-5137. You can find more information on lobbying with Miami-Dade County [here](#)



DANIELLA LEVINE CAVA
MAYOR
MIAMI-DADE COUNTY

August 5, 2022

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

Re: FPL Ten Year Site Plan Comments; Docket 2022000

Dear Chairman Fay, Commissioners Graham, La Rosa, Clark and Passidomo:

In April 2022, Florida Power and Light (FPL) published their 2022 edition of the Ten-Year Site Plan (TYSP). In this filing, FPL outlines its plan for the next ten years with regards to its electrical grid and the fuels that will be used to power it. The modest increases in solar and battery storage, and the continued reduction in coal over the ten-year timeline of the plan in the "Business as Usual Resource Plan" is insufficient to get Florida quickly on a path to a clean energy future. We are also glad to see that the originally proposed "Recommended Resource Plan," which used unverified methodologies to prepare for an unlikely extreme cold weather event, was withdrawn.

There are two developments relative to the 2022 TYSP that would like to bring to your attention. The first is the release of our Miami-Dade Climate Action Strategy in 2021. The Climate Action Strategy is an ambitious roadmap to drastically reduce our community's carbon pollution by committing to reduce our Community-Scale greenhouse gas (GHG) emissions by 50% from 2019 levels by 2030 and achieve net-zero emissions for our County by 2050. As founding members of ICLEI – Local Governments for Sustainability, we have joined the international "Race to Zero" campaign to reach zero by 2050. This mirrors the timeline established by the Federal government as well. Crucially, because nearly half of our countywide GHG emissions are the result of electricity consumption, our ability to meet these goals is deeply interwoven with the emissions that are released by the fossil fuel power plants that power our grid. In addition, we also expect that the rapid shifts to electrification in the transportation sector will lead to an increased reliance on the grid to power electric vehicles. This transition to electric vehicles is a key pillar of our Climate Action Strategy and elevates the importance of a rapid conversion to carbon-free electricity.

FPL, as the provider for the majority of our County's electricity, is a critical partner in the efforts of our County and others in its service territory to meet the urgency of the moment and reduce GHG emissions sufficiently to avoid the worst projected outcomes of climate change. Figure 1 below identifies that through implementation of the Climate Action Strategy alone, assuming future grid conditions identified in the 2021 TYSP, we project a significant "gap" between our forecasted emissions and target 2030 goal. A cleaner, carbon-free electricity grid is essential to reducing this gap and achieving our goal.

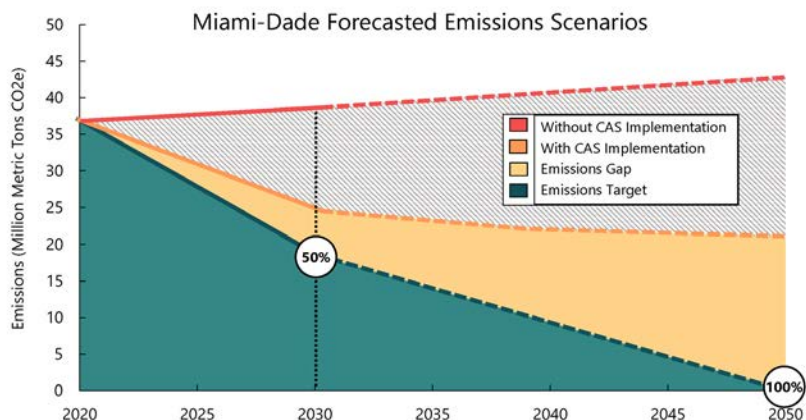


Figure 1. Projected scenarios for GHG emissions in Miami-Dade County. Notably, our CAS Implementation Scenario falls short of our goal. A carbon-free grid would represent a critical path for us to close the gap and reduce remaining emissions. This forecast was developed using future grid conditions identified in the 2021 TYSP.

Another key strategy we are pursuing is reducing the energy demand from new and existing buildings throughout our county. We continue to object to the limited demand-side management, or energy efficiency efforts, considered in FPL’s Business as Usual Plan. This is noted in Schedule 3.1, which forecasts summer peak demand and shows that FPL will stop investing in any additional new energy efficiency after 2024. Miami-Dade County has a long history of successful investments in energy efficiency to help curb electricity demand and reduce GHG emissions, and numerous studies in Miami-Dade, Florida and across the country have demonstrated that investments in energy efficiency offer quick paybacks and reduce the need for further expand electrical generation capacity to meet demand. This is particularly salient to the 2022 TYSP, as FPL’s grid is currently projected to continue to rely predominantly on fossil fuels for at least the next decade. We strongly urge the PSC to work with FPL to greatly expand their commitment to demand-side management programs that help homeowners and businesses become more efficient energy consumers.

The second important observation we would like to note is the release in June 2022 of NextEra’s “Real Zero” plan. This ambitious plan represents the most substantial commitments to carbon-free electricity in the southern United States. Preliminary information from NextEra has indicated that FPL will play a major role in achieving these goals. We are excited to see this commitment, as the trajectory of the FPL grid under the Real Zero plan is much more in line with the carbon reduction investment needed for Florida and Miami-Dade. We would strongly encourage a rapid integration of this plan into the 2023 TYSP. We support the adoption of “Real Zero” into the TYSP, and we look forward to supporting this new vision for a net-zero energy grid that supports our Climate Action Strategy with FPL as they update and implement their ambitious renewable energy commitments.

We urge the PSC to support and encourage FPL to move forward more rapidly with energy conservation and renewable energy deployment by incorporating the Real Zero plan into the 2023 TYSP.

Please do not hesitate to contact our Office of Resilience and Jim Murley, our Chief Resilience Officer, at James.Murley@miamidadegov or by calling (305) 375-4811, if you have any questions. Our Climate Action Strategy is available online at www.miamidade.gov/climateactionstrategy

Sincerely,

Daniella Levine Cava
County Mayor

c: Honorable Chairman Jose “Pepe” Diaz, and Members, Board of County Commissioners
Office of the Mayor Senior Staff
James F. Murley, Chief Resilience Officer, Office of Resilience