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

**VIA EMAIL**

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Re: Public Comment, Miami-Dade County, for Docket No. 20200181-EU (Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities)

Dear Chairman and Commissioners:

Thank you for the opportunity to provide these comments on the Commission's proposed revisions to its Florida Energy Efficiency and Conservation Act (FEECA) rule with the intention of increasing both access to and the scope of energy-saving programs offered by Florida's utilities.

Miami-Dade County has a long history of supporting and implementing policies to improve energy efficiency in order to reduce greenhouse gas emissions associated with climate change impacts such as sea level rise and extreme heat, which are already significantly impacting our residents and businesses. Just as importantly, the County recognizes the essential role that robust energy efficiency programs can play in our community, especially in low-income households. Efficiency programs can help our residents and businesses reduce their energy use, save money, create tens of thousands of local, family-wage jobs that can't be outsourced, and keep more dollars in the community. Energy efficiency is also directly linked to equity and housing affordability, one of the County's largest challenges. Reducing energy use through increasing efficiency is a core approach guiding Miami-Dade documents and plans such as our [Climate Action Strategy](#) and our [Electricity Master Plan](#). Miami-Dade County is pleased to offer the following recommendations related to the November 2022 Rule Development Workshop.

**General Recommendations:**

- Establish and maintain numerical *quantitative* energy efficiency kW and kWh goals for all regulated utilities during any rule changes. Quantitative goals are critical for ensuring that energy efficiency is pursued at appropriate levels as well as for measuring the success of utilities in achieving their FEECA related goals.
- For low-income programs, establish and maintain minimum spending requirements and numerical *quantitative* energy saving kW and kWh goals that are in proportion to the low-income population in the utility's service territory.
- Direct utilities to review and propose best practice programs recognized nationally for innovation and performance for serving low-income and multi-family ratepayers.
- Direct Florida's utilities to convene a stakeholder collaborative/advisory board to coordinate and optimize energy efficiency offerings.

## Energy Efficiency Cost Effectiveness Recommendations and Related Low-Income Considerations

As the Commission considers revisions to its FEECA rulemaking, we urge you to take on reforms that will help Florida pave the way to greater energy efficiency standards. By bringing key requirements in line with national best practices, you can shift the decisions made by Florida's utilities to increase their energy efficiency goals during rulemaking and goal-setting procedures. [Updating](#) these foundational policies is key to implementing robust residential and non-residential energy efficiency programs that will reduce energy waste and provide economic and environmental benefits to Floridians. These changes are especially critical in the Miami metropolitan area where 57% of low-income households face an energy burden that is two or three times higher than other households. Energy efficiency programs have been shown to be effective in alleviating high energy burdens, which then leads to improvements in housing affordability and alleviating poverty levels. For these reasons, we urge the Commission to:

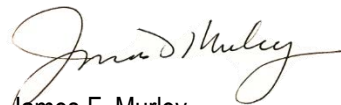
- Eliminate the “two-year payback screen” to evaluate energy efficiency investments.
- Incorporate “adders” as part of energy efficiency cost-effectiveness analyses in order to account for the many non-energy benefits that energy efficiency delivers such as avoided utility environmental compliance costs, reduced air pollution, and participant health benefits — among others.
- Exempt energy efficiency programs for low-income Florida residents from cost-effectiveness screening and/or develop cost-effectiveness rules that reflect the additional benefits that low-income programs deliver, for example by instituting a 25% non-energy benefits adder that is applied to low-income customer programs.
- Allow programs for households earning at or below 200% of the federal poverty level (as determined by the United States Department of Health and Human Services) to include measures that have otherwise been “screened out” using a two-year payback screen or free ridership analysis applied to the residential customer class as a whole.
- Use standard practice tests like the total resource cost test (TRC) or the Utility Cost Test (UCT) to evaluate the costs and benefits of energy efficiency in place of the RIM test.

## End-Use Categories Recommendations

Miami-Dade County encourages the Commission to reject the proposed “Natural Gas Substitutes for Electricity” Major End-Use Category. Distributed energy resources such as onsite solar photovoltaics and storage will help transition to a more resilient Florida and are more appropriate when combined with effective energy efficiency and other demand-side management measures.

Thank you for the opportunity to provide input on this rulemaking. We stand ready to assist in any way that we can. Should you wish to reach us, please contact James Murley, Chief Resilience Officer, by email at [James.Murley@miamidade.gov](mailto:James.Murley@miamidade.gov) or by phone at 305-375-4811.

Sincerely,



James F. Murley  
Chief Resilience Officer  
Miami-Dade County