

**From:** [Neville Williams](#)  
**To:** [Lee Eng Tan](#)  
**Subject:** Solar Energy in FL - Request for Comments  
**Date:** Monday, June 01, 2015 4:57:59 PM

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DATE: June 1, 2015  
TO: Lee Eng Tan, Senior Attorney, Office of the General Counsel, FL-PSC  
FROM: Neville Williams, Naples

1. Reverse the ban on third-party financing of residential and commercial solar power systems up to 2 megawatts per system. Keep net-metering in place as currently instituted for five years, after which utilities and solar providers can propose policies and metering rates for independent energy providers that reflect the cost of two-way power distribution. In addition, re-institute energy conservation and efficiency programs required by utility operators.
2. Waive the property tax assessment on commercial solar installations (as was done for residential solar). Propose a renewable portfolio standard ("RPS") such as exists in at least 25 states. Set up a renewable energy credit system including a carve-out for solar renewable energy credits ("SRECS") which can be traded on the open market as they are in states with RPS rules.
  - a) No. 1 can only be reversed by the legislature or by constitutional amendment, but the PSC may provide advice and input, and possibly take a position on the issue.
  - b) It is not clear what policies or programs can be implemented under current FPSC rules regarding solar policies in Florida.
  - c) In a competitive energy environment, system reliability is in everyone's interest and smart leaders can assure a smart grid. Distributed generation is the future, not centralized energy production. While solar power can be produced by large-scale solar farms, the burden on the grid is less when power is produced at the user's location.
  - d) More solar power means less natural gas that needs to be imported to Florida, and fewer dollars leaving the state to pay for fuel. While natural gas is inexpensive now, its cost could rise, while solar's cost are fixed at the time of installation, and prices of solar panels continue to drop. Florida has no coal or oil, and it's irresponsible to rely only on gas and nuclear power when, as we see in Germany, solar can be a major source of power in the "sunshine state." And, solar is now at grid parity and in most markets is the cheapest form of energy you can buy.
  - e) See above: distributed generation relieves pressure on the grid, prepares for large-scale deployment of commercial and residential energy storage systems, and produces no carbon emissions. Floridians prefer clean power. While Florida's utilities use little coal, natural gas is only 50% cleaner than the world's dirtiest fuel. Solar is 100% cleaner.
  - f) There are no costs to opening up Florida to independent solar

as 45 other states have done with no costs to the government or to utilities. When solar power becomes 10% of the electricity supply, then utilities which own and operate their own grid may argue that solar providers should pay their fair share of grid maintenance, and this can be negotiated in a fair and honest way at the time. Meanwhile, private solar power production will have little or no effect on the regulated monopoly electricity providers. Until a threshold of at least 10% solar exists, the utilities' claim that they need to match solar with additional standby power is specious and self-serving since they already have that power in place. They will be able to shut down certain generators at peak solar hours, saving on wear and tear and fuel costs.

g) Additional power generation, needed in a growing state, will be paid for by private residential and commercial customers, not the utilities, so they need not invest in more power generation and thus can afford to maintain the grid as a public service, not their own private distribution system. The grid, as it is in many states and regions, should be publicly operated. The idea that poor people will subsidize rich people's solar systems is a huge lie and a mind-boggling distortion of facts that only indicates the desperation of a regulated monopoly and out-dated power industry that doesn't want people or businesses or industry owning their own power production anymore than AT&T wanted people to own their own telephones.

3) Repeat: Institute a renewable portfolio standard, a system of tradable renewable energy credits, energy efficiency and energy conservation programs and policies, and push for the removal of the property tax on commercial solar in the only state out of 50 that taxes commercial solar installations (while collecting no tax revenues since there is no commercial solar industry). The FPSC can promote technical training in the solar field (as will be soon undertaken by FGCU's Emergent Technology Institute), and advertise that Florida is open to a whole new industry that will provide at least 10,000 new jobs.

Thank you.

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