

**Brian Schultz**

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**From:** Office of Commissioner Fay  
**Sent:** Wednesday, January 13, 2021 7:49 PM  
**To:** Commissioner Correspondence  
**Subject:** FW: Electric Utilities Rule Development Workshop; Docket #20200181  
**Attachments:** Audubon FL 1-13-21 Letter to PSC Re Energy Savings Goals.pdf

Please place the attached letter in Docket No. 20200181

Thanks

**Veronica D. Washington**

Executive Assistant to Commissioner Andrew Fay  
Florida Public Service Commission  
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(850)413-6036  
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**From:** Alvi, Beth [<mailto:Beth.Alvi@audubon.org>]  
**Sent:** Wednesday, January 13, 2021 3:46 PM  
**To:** Records Clerk; David Glassner  
**Cc:** Office of Chairman Clark; Office of Commissioner Graham; Office of Commissioner Brown; Office of Commissioner Fay; Office of Commissioner La Rosa  
**Subject:** Electric Utilities Rule Development Workshop; Docket #20200181

Dear Public Service Commission and Staff,  
Please accept Audubon Florida's preliminary comments on FEECA rulemaking to inform the PSC's workshop on January 14, 2020 . Thank you for the opportunity to provide input. Please let us know if we can provide additional information.  
Regards,

Elizabeth Alvi  
Director of Policy  
W:850-999-1028  
C:850-591-9784 (call/text)  
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January 13, 2021

Chairman Gary F. Clark  
Commissioner Julie I. Brown  
Commissioner Art Graham  
Commissioner Andrew G. Fay  
Commissioner Mike La Rosa

Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399  
Sent via email: [Clerk@psc.state.fl.us](mailto:Clerk@psc.state.fl.us)

**Re: Goals for Electric Utilities Rule Development Workshop; Docket #20200181**

Dear Florida Public Service Commission and Staff,

The PSC's opportunity to evaluate the energy efficiency goals for electric utilities can provide much more than energy efficiency goals and results. While energy efficiency is and can be the desired outcome, the structure and implementation of these new rules can provide economic security, strengthen environmental protection, and fortify Florida's resilience.

We ask that the RIM Test and ROI restrictions are removed, efficiency goals are set at or near 1%, and DSM structures allow for greater integration to developing grid technology.

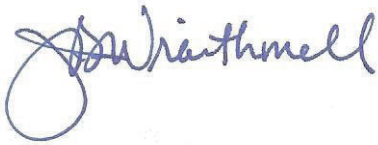
Utilities have a challenging task of providing energy services to their customers and economic profit to investors, while also reducing customer costs. Eliminating the Ratepayer Impact Measure (RIM) Test will help transform energy efficiency improvements from penalties to benefits. This elimination should be paired with performance metrics and a reasonable and functional goal of efficiency closer to 1% than 0%.

The RIM Test combined with removal of energy efficiency measures with returns on investment (ROI) of less than 2 years effectively negates all of the "low-hanging fruit" of efforts. While utilities must be investing in long-term strategies, they should also strive for the actions that can produce results now. These efforts should not be solely viewed in a capital economic framework, they must assess the broad societal costs and benefits. Impact on ratepayers should still be addressed as a priority, so that low-income programs can effectively protect our most vulnerable citizens. Effective implementation of energy efficiency actions that fall outside the RIM Test and 2-year limit on ROI can help to drive down Florida's high-ranking average utility bills.

Improving energy efficiency standards can simultaneously bolster our resilience to storms and the perennial threats Florida faces from hurricanes. By improving demand side management (DSM) to integrate further with next generation grid technology, Florida utilities can continue to provide energy security for their customers. Through measures such as enhanced battery storage, rooftop solar, and improved demand response, Florida can be the leader in storm readiness.

The PSC has the opportunity to shepherd in a new era in Florida energy policy. With the ongoing economic impacts of the pandemic, Floridians need cost savings now more than ever. Modernized energy efficiency rules can provide jobs, stability for our hard-working families, clean air and water, and economic and natural resilience. Thank you for ensuring Florida can be a leader in this essential work.

Sincerely,

A handwritten signature in blue ink that reads "Julie Wraithmell". The signature is fluid and cursive, with a large loop at the beginning.

Julie Wraithmell  
Executive Director

**CC:**

[Commissioner.Clark@psc.state.fl.us](mailto:Commissioner.Clark@psc.state.fl.us)  
[Commissioner.Graham@psc.state.fl.us](mailto:Commissioner.Graham@psc.state.fl.us)  
[Commissioner.Brown@psc.state.fl.us](mailto:Commissioner.Brown@psc.state.fl.us)  
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