

18143 SW 93 Avenue
Palmetto Bay, FL 33157-5741

September 22, 2020

Mr. Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Reference: Docket **20200092-E1**

This letter is in regard to the developments at the Public Service Commission (PSC) regarding Florida electric utilities' Storm Protection Plans (SPPs). Florida's for-profit utilities are using the opportunity and incentives provided by a recent-enacted SPP state law to make massive and largely ineffective investments in Florida's electric grid.

The plans anticipate rate increases of \$18 to \$29 per customer, per month by 2029, though there is no way to measure post-storm restoration performance, and no way to hold utilities accountable for proposed improvements.

On Aug. 10, in rubber-stamp hearings which were part of rushed regulatory proceedings, PSC commissioners unanimously approved the four utilities' Plans (Florida Power & Light/FPL, Duke Energy Florida, Tampa Electric Company, and Gulf Power Company).

It is estimated that Florida electric customers will pay \$40 billion for the Plans by 2059, including an estimated \$12 billion in profits for utilities. All customers will subsidize a tiny few. Despite the SPPs massive size, few customers will experience shorter storm-related outages. For example, just 4% of FPL's residential customers and 5% of Duke Energy's will get their overhead power lines undergrounded. The Plans are not strategic, and do not consider any modern options for reducing grid dependence, like solar, batteries, or a more decentralized electricity system. None of the SPPs complied with the PSC's own Rules (25-6-030) for such Plans.

The following recommendations are provided:

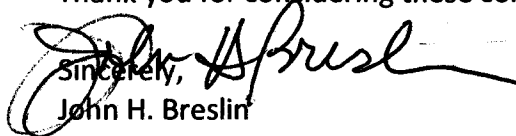
Three research projects are urgently needed to inform plan modifications to include:

1. Storm restoration improvement likely from various programs common to all plans.
2. The economic value per hour or day of storm restoration improvement by customer type and for communities over all; and
3. The cost to Florida communities and economy of electric rate increases.

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Finally, it is recommended that the Public Service Commission modify all four Storm protection Plans due to their failure to meet key provisions of PSC Rule 25-6-030as well as other issue which have been brought forward. Despite deficiencies you have approved all four utilities' initial plan updates (required every 3 years). The opportunity for the PSC to modify Plans is now limited to annual rate increase request and the utilities Plan updates (required every three 3 years). You must address this matter now and please do not rush this through without thoughts to such items as reductions in post-storm service restoration time and future vision for electric distribution. My electric company is Florida Power and Light, I have been a customer for over 50 years, I believe that if this is being done then it should be done right and with the public's knowledge and consent. Careful thought must be done to make sure it is done right and not overcharging the customers.

Thank you for considering these comments for myself and for all Florida consumers.

Sincerely,
John H. Breslin

John and Natalie Breslin
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