

**Brian Schultz**

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**From:** Brian Schultz on behalf of Records Clerk  
**Sent:** Friday, January 08, 2021 8:22 AM  
**To:** 'Ellengerstle@gmail.com'  
**Cc:** Consumer Contact  
**Subject:** RE: Docket No. 20200181; Modernize Florida's outdated efficiency practices

Good Morning, Ellen Gerstle

We will be placing your comments below in consumer correspondence in Docket No. 20200181-EU and forwarding your comments to the Office of Consumer Assistance and Outreach.

Sincerely,

Brian Schultz  
Commission Deputy Clerk II  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399  
850.413.6770

PLEASE NOTE: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are considered to be public records and will be made available to the public and the media upon request. Therefore, your e-mail message may be subject to public disclosure.

-----Original Message-----

From: Ellengerstle@everyactioncustom.com <Ellengerstle@everyactioncustom.com>  
Sent: Thursday, January 07, 2021 7:14 PM  
To: Records Clerk <CLERK@PSC.STATE.FL.US>  
Subject: Docket No. 20200181; Modernize Florida's outdated efficiency practices

Dear Florida PSC Commissioners,

We all know that energy efficiency means using energy smarter. It is the quickest, cleanest, and cheapest way to meet our energy needs while helping Floridians cut energy waste and manage power bills. Helping hard-working families make their homes more efficient, safer, and secure also keeps energy dollars in local communities.

Yet the practices you rely upon in setting goals for the state's largest utilities haven't been modernized in almost 30 years – and that has led to Florida's largest power companies badly trailing leading utilities in the Southeast and across the nation in delivering energy savings to families and businesses. Most recently, this outdated approach led to power companies proposing goals of zero. We can do better.

As you set out to revisit the energy efficiency goal setting rules, please update the economic screening practices so they no longer penalize efficiency measures that meaningfully reduce energy waste for homes or businesses. Isn't the whole idea of an efficiency program, to reduce energy use to meet demand and help customers lower power bills? Efficiency measures with payback. As long as 7 years still make sense if they are reducing our carbon emissions!

Most importantly:

First, when setting annual savings targets the PSC relies on the Rate Impact Measure (RIM), a test that fails to properly account for customer energy savings as a benefit. The RIM test actually considers your bill savings as a cost, rather than a benefit – because the utility company receives less revenue. Isn't the whole idea behind energy savings to cut energy waste and reduce your utility power bill?

The second problem is that the PSC allows Florida utilities to automatically and arbitrarily eliminate any efficiency measure with a payback of fewer than two years, thereby eliminating the most cost-effective and impactful efficiency measures for customers. Why do we penalize common-sense efficiency measures that can improve people's lives?

3. Identify homes, apartment buildings and commercial buildings in the top decile of energy use per square foot in their respective categories and arrange energy audits and offer financial assistance for remediation where appropriate. This process must be repeated yearly.

4. Modern heat pumps are much more efficient than older air conditioning units. Incentivize and inform commercial building owners of the cost savings with heat pumps plus geo-engineering.

5. Assist homeowners with AC units over 7 years old in updating to high-efficiency pumps as well as Bradford heat pump water heaters

6. Ask the legislature to upgrade building code to the "passive home" standard.

It's time to use the rulemaking process to modernize your decades-old practices and consider ways to get utilities to do more on efficiency, in particular for low-income customers. The rule is outdated, we must get it right.

Sincerely,  
Ellen Gerstle  
Delray Beach, FL 33446  
Ellengerstle@gmail.com