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COMMISSIONERS
BECKY TOOLEY

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

Re: Docket No. 20200181

Dear Chairman Clark and Commissioners Brown, Graham, Fay and La Rosa:

As the Florida Public Service Commission (PSC) explores revisions to the Florida Energy Efficiency and Conservation Act (FEECA) conservation goal setting rule, we urge you to address head-on the core issues in the process that create roadblocks to capturing energy savings for customers and that have led to very weak energy savings achievements in Florida compared to the rest of the country. It has been almost 30 years since the rule has been revisited. We need to get it right.

No other state relies on the outdated cost effectiveness and screening methods - the Rate Impact Measure test and the 2-year payback screen – that Florida uses. This practice led many of the state's largest electric utilities to propose zero or near zero goals in the 2019 FEECA process.

As local elected officials, we are frustrated by these abysmal results, as you should be as well. We are keenly aware of the important role that robust energy efficiency programs can play in our community. Efficiency programs help our residents reduce energy use and save money on power bills – keeping more dollars in the local economy rather than leaving the state to bring in fuels from elsewhere.

Efficiency programs help reduce the energy burden – the disproportionately higher percentage of income – that our most vulnerable low-income residents pay for power bills. Offering programs to address the needs of low-income families is more important than ever given the continuing economic fallout from the COVID-19 crisis. The thousands of families that are in arrears on bills or have been disconnected lays bare the fact that at so many have unnecessarily high bills in the first place.

Energy efficiency is the quickest, cheapest and cleanest way to meet customer energy demand, and for local governments to meet climate sustainability and resilience goals. But, when energy savings targets are set too low by PSC Commissioners, electric utilities underinvest in energy efficiency. This limits customer access to the most effective methods to reduce monthly power bills and hinders our ability to both meet established local sustainability goals.

When FEECA was established in 1980, the legislature recognized the importance of both controlling the growth rates of electricity consumption and peak demand through conservation programs, and that doing so would protect the health, prosperity and welfare of the citizens of the state. Their original intent rings even truer today, but decades-old practices used in setting the state's efficiency savings targets are outdated and only serve to trap people with excessive bills.

Energy efficiency policy is dynamic. Technologies and customer needs change. So should the Commission's rules.

Therefore, we request that the PSC address the roadblocks holding back progress and ensure that those practices comport with national best practices. We believe that this will lead to the best outcome for the state and its citizens.

Sincerely,

Becky Tooley
Commissioner

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