

Jacob Ve Vaughn

From: Betty Leland on behalf of Office of Commissioner Graham
Sent: Monday, February 1, 2021 9:09 AM
To: Commissioner Correspondence
Subject: FW: Docket No. 20200181; Everglades Coalition Resolution Supporting Modernizing Florida's Outdated Efficiency Practices
Attachments: Jan 2021_RESOLUTION OF THE EVERGLADES COALITION ENCOURAGING THE FLORIDA PUBLIC SERVICE COMMISSION TO REFORM ITS 30-YEAR OLD ENERGY EFFICIENCY GOAL SETTING ECONOMIC SCREENING PRACTICES IN ORDER TO PROMOTE HIGHER LEVELS OF ENERGY SAVINGS.pdf

Good Morning:

Please place this email in Docket #20200181.

Thanks.

*Betty Leland, Executive Assistant to
Commissioner Art Graham
Florida Public Service Commission
bleland@psc.state.fl.us
(850) 413-6024*

From: Everglades Coalition [mailto:info@evergladescoalition.org]
Sent: Friday, January 29, 2021 6:10 PM
To: Records Clerk; Office of Commissioner Brown; Office of Commissioner Fay; Office of Commissioner La Rosa; Office of Commissioner Graham; Office of Chairman Clark
Subject: Docket No. 20200181; Everglades Coalition Resolution Supporting Modernizing Florida's Outdated Efficiency Practices

Dear Public Service Commission,

The Everglades Coalition, with its more than sixty member organizations committed to the protection and restoration of America's Everglades, hereby urges the PSC, through its conservation goal setting rulemaking process, to reform decades-old conservation goal setting practices to comport with national best practices in order to move the state to a more sustainable and water-smart clean energy future while also providing economic, environmental, and public health benefits. **Please accept the attached resolution.**

Please do not hesitate to reach out with any questions.

Thank you,
Kaitlynn Reneke
Administrative Coordinator, Everglades Coalition
info@evergladescoalition.org
www.evergladescoalition.org



Everglades Coalition

1000 Friends of Florida
Angler Action Foundation
Audubon Florida
Audubon of Southwest Florida
Audubon of the Western Everglades
Audubon Everglades
Backcountry Fly Fishers of Naples
Calusa Waterkeeper
Cape Coral Friends of Wildlife
Center for Biological Diversity
Conservancy of Southwest Florida
Defenders of Wildlife
“Ding” Darling Wildlife Society
Earthjustice
Environment Florida
Everglades Foundation
Everglades Law Center
Everglades Trust
Florida Bay Forever
Florida Conservation Voters Education Fund
Florida Defenders of the Environment
Florida Keys Environmental Fund
Florida Native Plant Society
Florida Oceanographic Society
Friends of the Arthur R. Marshall
Loxahatchee National Wildlife Refuge
Friends of the Everglades
Hendry-Glades Audubon Society
International Dark-Sky Association,
FL Chapter
Izaak Walton League of America
Izaak Walton League Florida Division
Izaak Walton League Florida Keys Chapter
Izaak Walton League Mangrove Chapter
Lake Worth Waterkeeper
Last Stand
League of Women Voters of Florida
Martin County Conservation Alliance
Miami Pine Rocklands Coalition
Miami Waterkeeper
National Audubon Society
National Parks Conservation Association
National Wildlife Refuge Association
Natural Resources Defense Council
North Carolina Outward Bound School
Ocean Research & Conservation Association
Peace River Audubon Society
Reef Relief
Sanibel-Captiva C
Sierra Club
Sierra Club Florida Chapter
Sierra Club Broward Group
Sierra Club Calusa Group
Sierra Club Central Florida Group
Sierra Club Loxahatchee
Sierra Club Miami
South Florida Audubon Society
Southern Alliance for Clean Energy
The Florida Wildlife Federation
The Institute for Regional Conservation
The National Wildlife Federation
Theodore Roosevelt Conservation
Partnership
Tropical Audubon Society

A RESOLUTION OF THE EVERGLADES COALITION ENCOURAGING THE FLORIDA PUBLIC SERVICE COMMISSION TO REFORM ITS 30-YEAR OLD ENERGY EFFICIENCY GOAL SETTING ECONOMIC SCREENING PRACTICES IN ORDER TO PROMOTE HIGHER LEVELS OF ENERGY SAVINGS

WHEREAS, the Everglades ecosystem has competing demands for water, including from the power sector, and water quality and quantity are critical for Everglades restoration;

WHEREAS, energy efficiency is widely understood to be the cleanest, quickest and most cost-effective resource in meeting electricity demand; and

WHEREAS, unlike conventional power generation, energy efficiency allows the utility to meet electricity demand with zero air emissions and no water use, thereby moving the state, and country to a cleaner and more sustainable and water-smart energy future;

WHEREAS, by reducing electricity demand, energy conservation reduces the need for the construction of new power plants and infrastructure that break up habitat and can impact water quality and quantity and reduces the operation of existing fossil fuel plants, not only lowering costs to customers but reducing greenhouse gas emissions, and air pollution that have a negative effect on public health and the environment; and

WHEREAS, the Florida Legislature passed the Florida Energy Efficiency and Conservation Act (“FEECA”) in 1980 to reduce peak electricity demand and energy consumption¹; and

WHEREAS, the Florida Public Service Commission (PSC) is statutorily required to establish conservation goals for FEECA utilities and review such goals every five years, at a minimum; and

WHEREAS, in turn, the utilities are required to develop cost-effective demand-side management plans that meet those goals and submit them to the PSC for approval; and

¹ Section 366.81, Fla. Stat.

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WHEREAS, in the most recent conservation goal setting proceeding in 2019, several large utilities filed proposed energy savings goals of zero or near zero; and

WHEREAS, the utilities' proposed goals were established by relying on economic screens such as the Rate Impact Measure (RIM) test and the 2-year payback screen that no other state in the nation relies upon for setting goals and has landed Florida near the bottom of state rankings on energy savings through utility efficiency programs²; and

WHEREAS, the PSC has established a rulemaking docket to consider changes in the process by which conservation goals are set and customer programs are approved in the future³; and

WHEREAS, the rulemaking process affords the PSC the unique opportunity to modernize its FEECA rules to end its reliance on these outdated economic screens and to increase the focus of conservation goals and programs to address meaningful energy savings opportunities and reduce the energy burdens of low to moderate income customers;

WHEREAS, reforming goal setting and approval of customers programs to national best practices in this area will generally lead to more robust energy efficiency programs offered to residential and commercial customers that will reduce energy waste and provide economic and environmental benefits;

NOW THEREFORE BE IT RESOLVED,

The Everglades Coalition, with its more than sixty member organizations committed to the protection and restoration of America's Everglades, hereby urges the PSC, through its conservation goal setting rulemaking process, to reform decades-old conservation goal setting practices to comport with national best practices in order to move the state to a more sustainable and water-smart clean energy future while also providing economic, environmental, and public health benefits.

APPROVED AND ADOPTED this 26th day of January, 2021



Mark Perry
Co-Chair



Marisa Carrozzo
Co-Chair

² American Council for an Energy Efficient Economy, *State Energy Efficiency Scorecard*, December 2020, p. 32.

³ Florida Public Service Commission, Docket No. 20200181

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