

**Antonia Hover**

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**From:** Antonia Hover on behalf of Records Clerk  
**Sent:** Monday, February 8, 2021 3:38 PM  
**To:** 'AlyssiaBerthoumieux@miamibeachfl.gov'  
**Cc:** Consumer Contact  
**Subject:** FW: Public Comment, City of Miami Beach, for Docket No. 20200181 (Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities)  
**Attachments:** FEECA Letter\_signed.pdf

Good Afternoon, Ms. Berthoumieux.

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

Thank you!

*Toni Hover*  
Commission Deputy Clerk I  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399  
Phone: (850) 413-6467

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**From:** Berthoumieux, Alyssia <AlyssiaBerthoumieux@miamibeachfl.gov>  
**Sent:** Monday, February 8, 2021 3:04 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Cc:** Tonioli, Flavia <FlaviaTonioli@miamibeachfl.gov>; Wheaton, Elizabeth <ElizabethWheaton@miamibeachfl.gov>  
**Subject:** Public Comment, City of Miami Beach, for Docket No. 20200181 (Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities)

Good morning,

Please place the attached letter in Docket No. 20200181 on behalf of City of Miami Beach.

Thank you in advance for confirming receipt of this email and the attachment.

Sincerely,



**Alyssia Berthoumieux**  
Sustainability Specialist  
Environment & Sustainability Department  
1700 Convention Center Drive – 3<sup>rd</sup> Floor, Miami Beach, FL 33139  
Tel: 305-673-7084 x6894

# MIAMIBEACH

City of Miami Beach, 1700 Convention Center Drive, Miami Beach, FL 33139, [www.miamibeachfl.gov](http://www.miamibeachfl.gov)

ENVIRONMENT AND SUSTAINABILITY  
DEPARTMENT

Tel: 305.673.7000 ext. 26121, Email: [elizabethwheaton@miamibeachfl.gov](mailto:elizabethwheaton@miamibeachfl.gov)

February 5, 2021

Chairman Gary F. Clark  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

**Re: Docket No. 20200181, Proposed amendment of Rule 25-17.0021, F.A.C.,  
Goals for Electric Utilities**

Dear Chairman and Commissioners:

Thank you for the opportunity to provide these comments on the Florida Public Service Commission's (PSC) proposed revisions to its Florida Energy Efficiency and Conservation Act (FEECA) rule.

The City of Miami Beach is committed to the adaptation and mitigation of climate change. For example, the City has taken steps to reduce our community's carbon emissions by completing annual greenhouse gas inventories, providing a Property Assessed Clean Energy (PACE) program for residents and businesses, commencing the development of a climate action plan and greenhouse gas emissions reduction targets, and adopting policies such the Green Building Ordinance and the Urban Heat Island Ordinance which encourage sustainable building. In addition, the City supports the Sierra Club's Ready for 100 campaign which challenges cities to set a target of 100% clean, renewable energy.

Despite robust efforts, local governments like ours are often constrained in how much we can do to drive down our total GHG emissions footprint since our direct ability to optimize the sources of energy that power the economy is limited. Therefore, we have a significant interest in finding ways to systematically improve the emissions performance of our electricity system, including through the support of policies and programs that eliminate energy waste and reduce peak demand. Additionally, energy efficiency programs help reduce the energy burden of our most vulnerable low-income residents. Given the continuing economic fallout from the COVID-19 crisis, programs that help consumers save money on their utility bills are more important than ever.

As the Commission considers revisions to its FEECA rule, we urge you to address the core policy issues causing Florida to lag behind the rest of the country when it comes to energy efficiency:

- 1) Specifically, no other state in the country relies as heavily on the Rate Impact Measure (RIM) test to evaluate energy efficiency programs.
- 2) Similarly, no other state in the country requires energy efficiency programs to demonstrate a return on investment in two years or less.

Both practices caused Florida's utilities to propose zero or near-zero goals for energy efficiency during the prior FEECA goal-setting process.

Robust energy efficiency programs play an important role in our community. Efficiency programs can help our residents and businesses reduce their energy use, save money, create local, family-wage jobs that cannot be outsourced, and keep more dollars in the community.

Therefore, the City of Miami Beach urges the PSC to strengthen its energy efficiency policies and programs by:

- **Using the total resource cost test or the participant cost test to evaluate the costs and benefits of energy efficiency, instead of the RIM test**
- **Eliminating the "two-year payback screen" to evaluate energy efficiency investments**
- **Adopting policies to support new and expanded energy-saving programs for low-income Floridians**

The City urges the PSC to set a minimum budget requirement for low-income programs. Other benefits should also be considered to evaluate the cost-effectiveness of low-income programs to effectively account for their health and safety benefits. A low-income customer advisory board should be created to guide the PSC and Florida's utilities in the design and implementation of low-income offerings.

On July 17, 2019, the City of Miami Beach Mayor and Commission passed Resolution 2019-30876 (attached) urging the Florida Public Service Commission to set meaningful energy efficiency goals in the 2019 Florida Energy Efficiency and Conservation Act proceedings. The resolution urged the PSC:

- To include a specific energy efficiency percentage goal
- To replace the ratepayer impact measure test with a critical cost-effectiveness test for electric efficiency programs
- To establish a strong energy efficiency resources standard for the state of Florida and adopt a strong demand side management program that includes utility rebates
- To require Florida electric utility companies to share with local governments anonymized energy consumption data at the census block level to allow

cities and counties to effectively design and implement their own energy conservation programs for residents and businesses

- To leverage federal weatherization assistance program funds to provide greater assistance to low income homeowners to require that most, if not all, of the numeric energy conservation goals be met through programs to assist low- and moderate-income households
- To establish a renewable energy generation goal for utilities

The programs provided by the electric utility provider are critical in the success of the goals and targets we set regarding climate action. We hope that the PSC addresses local communities' suggestions as we work together to build a more resilient future together. Together, local communities, regional partners and electric utilities can achieve greater successes and we can all attain our goals.

The City of Miami Beach appreciates your consideration of these comments. If you have any questions, please feel free to contact me at [elizabethwheaton@miamibeachfl.gov](mailto:elizabethwheaton@miamibeachfl.gov).

Sincerely,

DocuSigned by:  
  
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Elizabeth Wheaton  
Environment and Sustainability Director