

**Nickalus Holmes**

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**From:** Nickalus Holmes on behalf of Records Clerk  
**Sent:** Tuesday, May 27, 2025 3:28 PM  
**To:** 'SPARISEAU@broward.org'  
**Cc:** Consumer Contact  
**Subject:** FW: Broward County Comment Letter – Docket No. 20250011  
**Attachments:** Broward County Comments on FP&L Base Rate Increase- No. 20250011-El.pdf

Good afternoon Ms. Pariseau

We will be placing Monica Cepero's comments in consumer correspondence in Docket No. 20250011, and forwarding them comments to the Office of Consumer Assistance and Outreach.

Thank you,

Nick Holmes  
Commission Deputy Clerk II  
Office of Commission Clerk  
Florida Public Service Commission  
850-413-6770

**From:** Pariseau, Sarah <SPARISEAU@broward.org>  
**Sent:** Tuesday, May 27, 2025 3:15 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Broward County Comment Letter – Docket No. 20250011

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Dear Commissioners,

On behalf of Broward County, please find the attached comment letter regarding Florida Power & Light's petition for a rate increase, submitted for your consideration in the above-referenced docket.

Thank you for the opportunity to provide input on this matter.

Sincerely,  
Sarah Pariseau



Sarah Pariseau, Environmental Policy and Program Lead  
Resilient Environment Department  
115 S. Andrews Avenue, Room 329|Fort Lauderdale, FL 33301  
Office: (954)519-0310  
Cell: (754)296-6125  
[SPariseau@broward.org](mailto:SPariseau@broward.org)

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**MONICA CEPERO**, County Administrator

115 S. Andrews Avenue, Room 409 • Fort Lauderdale, Florida 33301 • 954-357-7354 • FAX 954-357-7360

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

May 23, 2025

Re: Comments on Florida Power & Light Company's Petition for Base Rate Increase; Docket No. 20250011-EI

Dear Commissioners:

On behalf of Broward County, I am writing to express concerns regarding Florida Power & Light Company's (FPL) petition for a base rate increase, submitted under Docket No. 20250011-EI.

While these comments have not been formally adopted by resolution of the Broward County Board of County Commissioners, they are consistent with the County's ongoing priorities related to energy affordability, climate resilience, and support for consumer-focused efficiency programs. We recognize and appreciate FPL's partnership on many initiatives vital to our region's sustainability and energy transition, including the collaboration with the SolarTogether program, which supports our broader climate and resilience goals. However, despite these efforts, Broward County must respectfully oppose the current rate increase proposal in its current form, due to its anticipated financial burden on our residents and the insufficient advancement of customer-focused efficiency solutions in our County.

#### *Excessive Rate Burden on Households*

Under FPL's proposed base rate increase of 13.31% for our region, over the next four years (2025-2029), a typical residential customer using 1,000 kWh per month would see their bill rise from \$134.14 in 2024 to \$151.99 by 2029. According to FPL's estimates, this would translate to an average of a \$9 monthly increase in 2026, growing to approximately \$18 more per month by 2029. In other words, customers will be paying more every year, roughly \$108 more per year in

**Broward County Board of County Commissioners**

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2026 and up to \$216 more per year by 2029. It is important to note that the 1,000-kWh usage estimate is likely conservative. Usage could vary significantly, especially for households with older, less efficient cooling systems and poorly insulated buildings. These households would consume more energy and are likely to face even steeper increases in their monthly bills.

FPL's current proposal marks the fourth base rate increase petition in just over a decade, following approved increases in 2012, 2016, and 2021. Each of these rate hikes has compounded over time, significantly elevating the financial burden on Florida households.

These increases arrive at a time when many Floridians are already grappling with rising costs for housing, insurance, and other basic necessities. Nearly one-quarter of households in Southeast Florida are considered highly or severely energy burdened, meaning they spend more than 10% of their gross monthly income on energy bills. Compounding this financial pressure is rising temperatures, wherein our residents are experiencing record-breaking heat year after year. In 2022 alone, 32% of Broward County residents—more than 650,000 people—lived in areas where temperatures exceed 110°F. This increase in extreme heat has potential serious public health implications.

Given the already high cost of living, compounded by record-breaking heat, additional utility cost increases could force families to make difficult trade-offs between cooling their homes and meeting other essential needs.

#### *Diminished Support for Low-Income Assistance Programs*

While we appreciate FPL's facilitating access to low-income assistance programs such as Low-Income Home Energy Assistance (LIHEAP) and offering their own assistance program (Care to Share), demand has far outpaced available resources. In March 2025, for example, Broward County had to temporarily suspend acceptance of new LIHEAP applications after a full month's funding was depleted in just one day. This underscores the urgency of not only denying the request for a rate hike, but also addressing energy affordability more comprehensively, such as structural rate reforms and accessible and expanded efficiency programs.

*Insufficient Commitment to Energy Efficiency*

Furthermore, while I have been advised that FPL has a robust load control program, we are troubled by its national ranking of 52 out of 53 major utilities nationwide for energy efficiency performance, according to the American Council for an Energy-Efficient Economy (ACEEE). This lack of investment in cost-saving efficiency programs deprives customers, particularly those most vulnerable, of meaningful opportunities to reduce energy use and lower monthly bills. Energy efficiency is widely recognized as the least-cost energy resource and should be central to any utility rate plan. Historically, FPL has argued that expanded energy efficiency programs are unnecessary due to the relatively low cost of energy they provide and concerns about equitable delivery of such programs. However, in the face of regular energy cost increases, growing household dependence on cooling, and the persistent absence of targeted efficiency programs delivered at scale, these issues outweigh the arguments for supporting such a rate increase request. We believe the capacity to implement such programs exists and encourage FPL to fully deploy them. As such, an additional rate increase at this time would impose an unfair and untimely financial burden on many households.

*Return on Equity Significantly Above National Norms*

FPL is requesting a Return on Equity (ROE) of 11.9%, a figure significantly above the national average (according to S&P Global Division of Public Utilities 2024 Report). In 2023, the national average authorized ROE for electric utilities was 9.60%, up modestly from 9.54% in 2022. By contrast, FPL's proposed ROE would place it at the very top of U.S. electric utilities and create an unbalanced burden on the residents of Broward County.

Given FPL's status as a regulated utility and the designated sole service provider for our region, customers do not have the ability to choose another provider or seek more competitive rates. This heightens the Public Service Commission's (Commission) responsibility to ensure that rates are fair, justified and aligned with the public interest.

Broward County remains committed to partnering with FPL on initiatives that advance clean, reliable, and affordable energy. However, we urge the Commission not to approve this proposed rate increase in its current form. Instead, we encourage the Commission to pursue a more

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balanced and equitable approach, one that includes an ROE in line with the national average, expanded investment in energy conservation, and stronger protection for households facing the highest energy burdens.

Thank you for the opportunity to provide comments. Should you have any questions or require additional information, please contact Dr. Jennifer Jurado, Chief Resilience Officer and Deputy Director of the Broward County Resilient Environment Department, at [jjurado@broward.org](mailto:jjurado@broward.org) or 954-519-1464.

Respectfully Submitted,



Monica Cepero  
County Administrator

cc: Board of County Commissioners

Dr. Kimm R. Campbell, Deputy County Administrator

Laurette Jean, Assistant to the County Administrator

Leonard Vialpando, Director, Resilient Environment Department

Dr. Jennifer Jurado, Deputy Director/Chief Resilience Officer, Resilient Environment Department