

Nickalus Holmes

From: Nickalus Holmes on behalf of Records Clerk
Sent: Thursday, June 26, 2025 8:14 AM
To: 'douglasantlewis@gmail.com'
Cc: Consumer Contact
Subject: RE: Request to Reject PSC Docket 20250011, FP&L's Proposed \$9.0B Rate Hike.

Good Morning

We will be placing your comments below in consumer correspondence in Docket No. 20250011, and forwarding them 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

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From: douglasantlewis@gmail.com <douglasantlewis@gmail.com>
Sent: Wednesday, June 25, 2025 8:00 PM
To: 'Doug Lewis' <douglasantlewis@gmail.com>
Subject: Request to Reject PSC Docket 20250011, FP&L's Proposed \$9.0B Rate Hike.

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Please abandon SC Docket 20250011, FP&L's Proposed \$9.0B Rate Hike and let me know if we are in agreement on the following relevant facts:

- 1. The state has seen a completely non-diversified supply of new electric generating capacity added from 2019-2025 by its Florida regulated utilities, being utility scale solar and battery storage only.*
- 2. Florida regulated utilities filed ten year site plans of the regulated utilities within SERC Florida project some 91% of 2025-2034 of new capacity additions being solar and battery storage (BESS).*
- 3. The related equipment deployed and planned (thin film PV and processed lithium battery components) emanates from Chinese supply sources, and Chinese sub-vendor countries. Fox News, Reuters, and other news agencies; along with a 2017 DOE Sandia lab evaluation have reported the presence of controlling sensors embedded within solar panels, power transformers, and inverters, of Chinese origin.*

4. *On an energy supply basis, this form of electrification supports Florida power generation only some 5.2 hrs. average hours per day per the NREL. Per The DOE Berkeley National Labs., the net accredited capacity factor of Florida Solar power is only 23%.*
5. *Based on the above, the Energy basis KwH installed cost of Florida solar power is 8.5X that of the advanced gas fired combined cycle power technology installed across Florida during the 2010-2019 period, and 4.25X as costly as that which would be applied, if based on present new combined cycle build cost estimates.*
6. *The battery storage proposed within the ten year site plans, required to back up just a portion of the intermittent solar power only 2-3 hrs. per day, costs 3.9X advanced combined cycle power.*
7. *Based upon the part time and non-reliable nature of the power sources described above, winter and summer peak reserve margins will suffer in Florida, adding to present reliability challenges. Winter reserve margins shall decline by some 10% according to FP&L alone. As well, Florida regulated utilities have begun soliciting customers to reduce power demand during summer and winter peak (ex. four thirty PM seven thirty PM summer peak periods) and shift this demand to midnight to five AM).*
8. *The Docket assumes as well that existing Florida serving constant duty, base load power plants across Florida shall be shuttered, adding great cost and a net reliability loss to ratepayers via the part time and intermittent, non-dispatchable solar replacement power.*
9. *FP&L 74.5MW solar farms consume on average, 680 acres each; across FP&L's filed ten year site plan, aggregating some 192,000 acres. This same annual KwH electrical capacity, if combined cycle, on an energy delivered basis, would consume only some 66 acres.*
10. *As large quantities of utility scale solar farms are added within a given region, their incremental capacity factor declines markedly, by up to some 40%, according to MISO and WECC studies.*
11. *Building this kind of solar and BESS capacity has caused rates to rise dramatically in all markets where applied heavily (Western Europe, CA, Australia), along with interim supply shortages to the detriment of consumer ratepayers and industry alike.*
12. *Alternate, cost effective, proven technology appears available to deploy here, given recent large awards to GE Vernova provided by Duke Energy (11 units), along with Nextera, targeting their hyperscaler and data center clients.*

I urge you to reject this extremely costly FP&L plan to continue to install a non-diversified supply of dominantly solar and BESS technology across Florida; as such would result in unacceptable economic, reliability, energy quantity, and land availability detriment to present & potential future Florida Power & Light ratepayers. Any disagreement with this assessment? If so, please advise. This will be a massive political issue and I can assure you that voters are watching.

Douglas A. Lewis

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