

Tristan Davis

From: Tristan Davis on behalf of Records Clerk
Sent: Tuesday, July 7, 2026 8:27 AM
To: KEITH HENNEK
Cc: Consumer Contact
Subject: RE: PUBLIC COMMENT FOR DOCKET NO. 20260001-EI

Good Morning,

We will be placing your comments below in consumer correspondence in Docket No. 20260001, and forwarding them to the Office of Consumer Assistance.

Thank you!

Tristan Davis
Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Phone: (850) 413-6121

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From: KEITH HENNEK <khennek@verizon.net>
Sent: Friday, July 3, 2026 9:36 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: PUBLIC COMMENT FOR DOCKET NO. 20260001-EI

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

PUBLIC COMMENT FOR DOCKET NO. 20260001-EI (REFERENCE: FILING 216370 / UNRESPONSIVE CASE 1500477E)

To the Commissioners of the Florida Public Service Commission:

I am writing to submit formal public testimony regarding the highly inequitable residential "minimum bill" rate design, building upon my formal Policy Objection submitted under **Filing No. 216370**. On June 9th, the Commission issued a directive under **Case Reference No. 1500477E** routing my file to FPL and stating the utility would contact me within three weeks. Nearly four weeks have passed, and **FPL has been completely unresponsive.**

This non-compliance proves that routing systemic tariff failures to a utility's routine call center is an unworkable evasion of this Commission's regulatory duties. FPL collects a guaranteed 10.95% corporate profit margin while completely ignoring your directives and leaving ratepayers stranded. I

am formally demanding that this Commission hold its regulated utility accountable, re-evaluate FPL's tariff rules, and establish a **Solar Connection Fee Cap of \$10.00 or less per month** for zero-net-consumption accounts.

The approved structural minimum bill floor—which scales to an actual **\$35.85 out-of-pocket cash cost** under local tax and franchise fee structures—explicitly violates the regulatory doctrine of gradualism. FPL currently charges a residential retail rate of **\$0.172 per kWh**, but only credits solar consumers **\$0.038 per kWh** for excess generation during true-up, flipping that clean energy to adjacent households at premium retail prices.

My attached empirical metrics prove that this structure creates an artificial, deadweight break-even rate of **\$0.3028 per kWh**, rendering private capital property investments financially impossible. Option A forces an immediate annual loss of \$367.32, while Option B forces a loss of \$387.96. Out-of-state utilities like Pepco in Maryland safely manage grid resilience on a standard \$9.95 base charge. I urge the FPSC to protect ratepayers, address FPL's silence under Case 1500477E, and implement a \$10.00 cap for net-zero accounts.

Respectfully submitted,

Keith M. Hennek
542 Maralinda Drive,
St Augustine, Florida 32095

Attachment: Verified Net-Metering Empirical Financial Analysis

FINANCIAL ANALYSIS OF PROPOSED SOLAR SYSTEM EXPANSION

Prepared for: Solar Account Review

Analysis Framework: Actual Consumption History vs. Fixed Utility Tariff Rates

I. Current Baseline Metrics (Optimized Break-Even)

- **Current Solar Contract Rate: \$87.74 per month**
- **Current Solar Generation Average: 596 kWh per month**
- **Effective Solar Generation Cost: \$87.74 divided by 596 kWh = \$0.1472 per kWh**
- **Average Total Household Energy Requirement: 843 kWh per month**
- **Remaining Grid Energy Deficit: 843 kWh - 596 kWh = 247 kWh**
- **Current Utility Retail Power Rate: \$0.172 per kWh**
- **Current Average Out-of-Pocket Grid Cost: 247 kWh x \$0.172 = \$42.48 per month**
- **Total Combined Energy Spend (Baseline): \$87.74 (Solar) + \$42.48 (Grid) = \$130.22 per month**

II. Expansion Option A: 4-Panel Add-on Analysis

- **Proposed New Solar Contract Rate: \$119.65 per month**
- **Mandatory Utility Connection and Hook-up Tariff: \$35.85 (Fixed regulatory minimum charge)**
- **Fixed Baseline Commitment (Solar Lease + FPL Fee): \$119.65 + \$35.85 = \$155.50 per month**
- **Projected Additional Generation: +216 kWh per month (New total: 812 kWh)**
- **Remaining Grid Deficit: 843 kWh - 812 kWh = 31 kWh**
- **Remaining Variable Utility Cost: 31 kWh x \$0.172 = \$5.33 per month**
- **Total Adjusted Spend with 4 Panels: \$155.50 (Fixed Commitment) + \$5.33 (Energy Gap) = \$160.83 per month**
- **Net Financial Impact: \$160.83 (New) - \$130.22 (Baseline) = +\$30.61 per month (Net Loss)**

III. Expansion Option B: 5-Panel Add-on Analysis

- **Proposed New Solar Contract Rate: \$127.62 per month**

- **Mandatory Utility Connection and Hook-up Tariff: \$35.85 (Fixed regulatory minimum charge)**
- **Fixed Baseline Commitment under Current Rules: \$127.62 + \$35.85 = \$163.47 per month**
- **Projected Additional Generation: +270.77 kWh per month (New total: 866.77 kWh)**
- **Monthly Net Excess Generation (Overproduction Bucket): 866.77 kWh - 843 kWh = 23.77 kWh per month**
- **Utility Avoided-Cost Buyback Credit Rate: Average value of \$0.038 per kWh**
- **Estimated Monthly Value of Overproduction Credit: \$0.92 per month**
- **Total Adjusted Spend with 5 Panels: \$163.47 (Fixed Commitment) - \$0.92 (Overage Credit) = \$162.55 per month**
- **Net Financial Impact: \$162.55 (New) - \$130.22 (Baseline) = +\$32.33 per month (Net Loss)**
- **Note on System Caps: If average monthly household energy consumption rises to or exceeds 866 kWh, the system will no longer overproduce, completely wiping out the overage credit.**

IV. True Break-Even Valuation (Regulatory Reality Check)

Because the utility enforces a fixed \$35.85 customer hook-up charge regardless of net-zero production status, the expansion can only break even when the saved cost of grid power matches or exceeds the added solar lease premium.

To determine the utility retail rate needed for a 5-panel system expansion to make financial sense, we use the following structural formula:

Added Solar Premium = (Displaced Grid Energy x Utility Retail Rate) + (Excess Energy x Avoided Cost Rate)

Substituting your specific system metrics into the formula:

- **\$39.88 = (247 kWh x Utility Retail Rate) + (23.77 kWh x \$0.038)**
- **\$39.88 = (247 x Utility Retail Rate) + \$0.92**
- **\$38.96 = 247 x Utility Retail Rate**
- **Utility Retail Rate = \$38.96 divided by 247 kWh = \$0.1577 per kWh**

The Fixed-Fee Disconnect:

While the solar generation itself would break even at a utility rate of \$0.1577 per kWh, this calculation completely falls apart when the mandatory utility grid connection fee is introduced.

Because you must pay the \$35.85 connection fee whether you take 247 kWh from the grid or 0 kWh from the grid, the utility's retail rate must climb significantly higher to offset this deadweight cost. To prevent a net monthly loss, the utility rate must absorb the combined burden of the lease expansion and the connection fee:

True Break-Even Rate = (Added Solar Premium + Utility Connection Fee - Excess Credit) divided by Total Replaced Grid Kilowatts

- **True Break-Even Rate = (\$39.88 + \$35.85 - \$0.92) divided by 247 kWh**
- **True Break-Even Rate = \$74.81 divided by 247 kWh**
- **True Break-Even Rate = \$0.3028 per kWh**

V. Definitive Conclusion

Per the Florida Public Service Commission (FPSC) scheduled base-rate adjustments, regional retail electricity rates are nowhere near \$0.3028 per kWh. Forcing this expansion forward moves the household into an immediate structural deficit, resulting in an unjustifiable annual loss of \$367.32 (for the 4-panel option) or \$387.96 (for the 5-panel option).
