



Via E-Filing

June 10, 2014

Carlotta S. Stauffer, Director
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399

RE: Docket No. 130199-EI (Florida Power & Light Company)
Docket No. 130200-EI (Duke Energy Florida, Inc.)
Docket No. 130201-EI (Tampa Electric Company)
Docket No. 130202-EI (Gulf Power Company)
Docket No. 130203-EM (JEA)
Docket No. 130204-EM (Orlando Utilities Commission)
Docket No. 130205-EI (Florida Public Utilities Company)

Dear Ms. Stauffer:

Please find enclosed for filing in the above-referenced consolidated proceeding the Prehearing Statement of The Alliance for Solar Choice. The Alliance for Solar Choice is concurrently filing a Petition to Intervene in this consolidated proceeding. Do not hesitate to contact me if you have any questions regarding this filing.

Sincerely,

/s/ Thadeus B. Culley

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Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals (Florida Power & Light Company).	DOCKET NO. 130199-EI
In re: Commission review of numeric conservation goals (Duke Energy Florida, Inc.).	DOCKET NO. 130200-EI
In re: Commission review of numeric conservation goals (Tampa Electric Company).	DOCKET NO. 130201-EI
In re: Commission review of numeric conservation goals (Gulf Power Company).	DOCKET NO. 130202-EI
In re: Commission review of numeric conservation goals (JEA)	DOCKET NO. 130203-EM
In re: Commission review of numeric conservation goals (Orlando Utilities Commission)	DOCKET NO. 130204-EM
In re: Commission review of numeric conservation goals (Florida Public Utilities Company)	DOCKET NO. 130205-EI
	FILED: JUNE 10, 2014

**PREHEARING STATEMENT OF
THE ALLIANCE FOR SOLAR CHOICE**

Pursuant to Order No. PSC-13-0420-PCO-EU, issued on August 19, 2013, establishing the prehearing procedure in this docket, The Alliance for Solar Choice (“TASC”)¹, by and through its undersigned qualified representative, respectfully submits its Prehearing Statement.

¹ TASC is concurrently filing a Petition to Intervene and Rebuttal Testimony in this consolidated proceeding.

A. APPEARANCES

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B. WITNESSES

<u>WITNESS</u>	<u>SUBJECT MATTER</u>	<u>ISSUE NOS.</u>
Nathanael Miksis EQ Research 436 14 th Street, Suite 1305 Oakland, CA 94612 Nathanael.Miksis@gmail.com	Opposition to proposal of EDF Witness Fine to incorporate program based on utility- ownership of distributed solar.	10, 11

C. EXHIBITS

TASC does not have any testimonial exhibits addressing the substantive issues in this proceeding. TASC’s only exhibit is the curriculum vitae of Nathanael Miksis (identified as Exhibit NM-1).

D. STATEMENT OF BASIC POSITION

TASC is committed to defending successful policies that provide customers choices in their consumption of electricity, including the adoption of onsite distributed solar generation. The utilities’ Solar Pilot Programs, while limited in scale and scope, are one type of program that is suited to encourage customer choices to adopt onsite solar and reduce demand and overall consumption from the grid, consistent with overall state goals under the Florida Energy Efficiency and Conservation Act (“FEECA”). Florida Statutes § 366.80 et seq.

The rooftop solar market in Florida, an essential element of demand-side renewable energy resource goals, still needs encouragement. TASC recommends against abandoning this program—that has received substantial customer interest—without first considering all due measures to try to fix any design flaws.

As several intervenor witnesses have observed, Florida is one of the richest states in terms of its technical potential for distributed solar development, but it is woefully behind the curve in terms of matching that potential. Enabling FEECA utilities to withdraw support for demand-side renewable energy systems, as all utilities suggest, does not help the state move up this curve nor does it support established state policy goals. The legislative goal of encouraging these resources has not changed since the utilities first implemented their respective Solar Pilot Programs.

As a governing principle, TASC believes that the future of demand-side renewable systems in Florida should logically be driven by demand-side (i.e. utility customer) preference and choice. As the solar market in Florida develops, the most efficient and sustainable path to reaching Florida's immense solar potential is through policies that enable customer-driven adoption of solar. This path is one that leverages private investment to further state goals and provides (in the long term) for market-based solutions to state policy priorities.

TASC suggests that the best investment is one that supports a long-term structure that encourages customer engagement and adoption of demand-side renewable energy systems. In the context of the FEECA and conservation goals, TASC recommends that the Commission continue to train its focus on policies that

will achieve this long-term result. This is an important pathway for Florida to take its place as a national leader in solar development.

Accordingly, TASC opposes the suggestion of Environmental Defense Fund's Witness Fine that utility-owned distributed generation should be considered as a means of reaching FEECA goals. As detailed in TASC's concurrently filed rebuttal testimony, there are numerous reasons why it is improper to shift focus away from the well-proven, customer-centric mechanisms into the workings and questionable benefits of a yet to be defined utility-owned program. Indeed, a utility-owned distributed solar program entails many risks for Florida customers and ratepayers. Generally, a utility-owned program will likely provide little more than window dressing of utility commitment to solar development, to the detriment of a mechanism that has actually spurred customers to act and adopt demand-side renewable systems to manage their electricity consumption.

TASC appreciates the opportunity to submit this Prehearing Statement and hopes that the Commission will stay the course and continue its leadership role in requiring the utilities to continue to encourage the distributed solar market to more quickly reach the point of long-term sustainability.

E. STATEMENT OF ISSUES

Order No. PSC-14-0154-PCO-EU identified the following issues as those that parties to the proceeding had agreed upon as issues to be addressed:

- 1. Are the Company's proposed goals based on an adequate assessment of the full technical potential of all available demand-side and supply-side conservation and efficiency measures, including demand-side renewable energy systems, pursuant to Section 366.82(3), F.S.?*

TASC's Position: TASC agrees with the position of the Sierra Club's Witness Woolf on this issue.

2. *Do the Company's proposed goals adequately reflect the costs and benefits to customers participating in the measure, pursuant to Section 366.82(3)(a), F.S.?*

TASC's Position: TASC agrees with the position of the Sierra Club's Witness Woolf on this issue.

3. *Do the Company's proposed goals adequately reflect the costs and benefits to the general body of rate payers as a whole, including utility incentives and participant contributions pursuant to Section 366.82(3)(b), F.S.?*

TASC's Position: TASC agrees with the position of the Sierra Club's Witness Woolf on this issue.

4. *Do the Company's proposed goals adequately reflect the need for incentives to promote both customer-owned and utility-owned energy efficiency and demand-side renewable energy systems, pursuant to Section 366.82, F.S.?*

TASC's Position: No. TASC disagrees with the utilities' proposal to terminate the solar PV pilot programs, as the current size of the Florida market for demand-side renewable energy systems is far below the technical potential throughout the state.

5. *Do the Company's proposed goals adequately reflect the costs imposed by state and federal regulations on the emission of greenhouse gases, pursuant to Section 366.82(3)(d), F.S.?*

TASC's Position: TASC agrees with the position of the Sierra Club's Witness Woolf on this issue.

6. *What cost-effectiveness test or tests should the Commission use to set goals, pursuant to Section 366.82, F.S.?*

TASC's Position: TASC agrees with the position of the Sierra Club's Witness Woolf on this issue.

7. *Do the Company's proposed goals appropriately reflect consideration of free riders?*

TASC's Position: TASC agrees with the position of the Sierra Club's Witness Woolf on this issue.

8. *What residential summer and winter megawatt (MW) and annual Gigawatt-hour (GWh) goals should be established for the period 2015-2024?*

TASC's Position: TASC has no position on this issue at this time.

9. *What commercial/industrial summer and winter megawatt (MW) and annual Gigawatt hour (GWh) goals should be established for the period 2015-2024?*

TASC's Position: TASC has no position on this issue at this time.

10. *What goals, if any, should be established for increasing the development of demand-side renewable energy systems, pursuant to Section 366.82(2), F.S.?*

TASC's Position: TASC agrees with the position of the Sierra Club's Witness Woolf on this issue.

11. *Should the Company's existing Solar Pilot Programs be extended and, if so, should any modifications be made to them?*

TASC's Position: TASC supports the position of the Southern Alliance for Clean Energy on this issue.

F. STATEMENT OF STIPULATED ISSUES

At this time, TASC is not a party to any stipulation regarding issues in this proceeding.

G. STATEMENT OF PENDING MOTIONS OR REQUESTS

At this time, TASC's only pending motion before the Commission in this consolidated proceeding is its Petition to Intervene, which was filed concurrently with this statement on June 10, 2014.

H. STATEMENT OF PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

TASC has no pending requests or claims for confidentiality.

I. OBJECTIONS TO WITNESS QUALIFICATIONS

TASC has no objections to witness qualifications at this time.

J. STATEMENT AS TO ANY REQUIREMENT IN ORDER THAT CANNOT BE COMPLIED WITH

TASC is not, at this time, aware of any requirements of the Order Establishing Procedure with which it cannot comply.

Respectfully submitted this 10th day of June, 2014.

BY /s/ Thadeus B. Culley
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Qualified Representative of The Alliance
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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2014, I sent a true and correct copy of this Prehearing Statement of The Alliance for Solar Choice to the following:

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Dated: June 10, 2014

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