

Brian Schultz

From: Brian Schultz on behalf of Records Clerk
Sent: Friday, August 09, 2019 1:50 PM
To: 'marybeth@psrflorida.org'
Cc: Consumer Contact
Subject: FW: Public Comment, PSRFlorida, for Docket Numbers 20190015, 20190016, 20190017, 20190018, 20190019, 20190020, and 20190021 (Commission review of numeric conservation goals).
Attachments: PSR FL Letter for FEECA 8.9.19.pdf

Good Afternoon, Marybeth Dunn

We will be placing your comments below in consumer correspondence in Docket Nos. 20190015-20190021 and forwarding your comments to the Office of Consumer Assistance and Outreach.

Sincerely,

Brian Schultz

Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
Brian.Schultz@psc.state.fl.us
850.413.6770

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From: marybeth@psrflorida.org [<mailto:marybeth@psrflorida.org>]
Sent: Friday, August 09, 2019 1:03 PM
To: Records Clerk
Subject: Public Comment, PSRFlorida, for Docket Numbers 20190015, 20190016, 20190017, 20190018, 20190019, 20190020, and 20190021 (Commission review of numeric conservation goals).

Public Comment, submitted by PSR Florida Board of Directors, for Docket Numbers 20190015, 20190016, 20190017, 20190018, 20190019, 20190020, and 20190021 (Commission review of numeric conservation goals).

Marybeth Dunn, MPH
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PSR FLORIDA



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August 9, 2019

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
(850) 413-6770

Re: Docket Numbers 20190015-EG, 20190016-EG, 20190017-EG, 20190018-EG, 20190019-EG, 20190020-EG, and 20190021-EG

Dear Mr. Teitzman,

Energy efficiency is a proven and cost-effective strategy for reducing greenhouse gas (GHG) emissions and improving air quality and public health. The Florida Energy Efficiency Conservation Act (FEECA) is an opportunity to set strong energy savings targets for Florida utilities and deliver these benefits to all Floridians. We urge the Florida Public Service Commission to set energy savings targets for utilities that ramp up to at least 1% per year.¹

Physicians for Social Responsibility (PSR) is a 501(c)(3) scientific and educational organization headquartered in Washington DC with over 30,000 health professionals, medical students and concerned citizen advocates in chapters across the country, including a chapter in Florida. Our mission is to protect human life from the gravest threats to health and survival; we number air pollution and climate change among those threats. PSR Florida has 2500 members and supporters across the state.

Reducing energy demand avoids the need to generate electricity and to build additional power plants, thereby reducing GHGs and other air pollutants emitted through the combustion of fossil fuels. The air pollution caused by burning fossil fuels damages major organ systems in the human body, contributing to the leading causes of death in the US: cancer, chronic lung disease, heart disease, and stroke. Deploying energy efficiency can help to mitigate these health harms.² Additionally, efficiency in buildings can also help to alleviate asthma triggers and other health ailments by improving indoor air quality and reducing temperature extremes for the building occupants.³

¹ In 2017 thirteen states saved at least 1% of retail electricity sales through efficiency programs. American Council for an Energy-Efficient Economy (ACEEE). 2018. *The 2018 State Energy Efficiency Scorecard*. <https://aceee.org/research-report/u1808>.

² ACEEE and Physicians for Social Responsibility (PSR). 2015. *Energy Efficiency and Health*. <https://www.psr.org/wp-content/uploads/2018/05/energy-efficiency-and-health.pdf>.

³ ACEEE. 2018. *The Next Nexus: Exemplary Programs that Save Energy and Improve Health*. <https://aceee.org/research-report/h1802>.

Floridians could realize significant health benefits from ramping up utility energy efficiency programs. If utility energy savings targets increased to 1% of retail electricity sales, pollution avoided from utility energy efficiency programs could generate over \$12 million in annual health benefits to Floridians, preventing hospital admissions due to respiratory and cardiovascular illnesses and avoiding restricted activity and costly lost work days. Investing more broadly in utility energy efficiency programs could generate even bigger health benefits.

In fact, Florida sees some of the greatest health benefits based on the total dollar value of health harms avoided from reducing energy consumption by 15% in a single year. These benefits would place Florida among the top seven states nationwide. Furthermore, Tampa, Miami, Orlando, Jacksonville would be ranked among the top 35 cities that would see the greatest health benefits from investing in energy efficiency.⁴ Such health benefits offer a powerful argument for us to move forward in implementing more robust energy efficiency programs.

Florida utilities' historic energy efficiency spending and savings fall well below that of fellow Southeast utilities, yet they have proposed even lower targets for the 2020-2029 period.⁵ Florida can look to effective energy efficiency models in neighboring states such as Arkansas and North Carolina, where utilities regularly meet stronger electricity savings targets set by their state regulators.

FEECA is an opportunity for utilities and regulators to deliver meaningful health, economic, and environmental benefits to Floridians. We urge the Florida Public Service Commission to seize this opportunity and increase energy savings targets for FEECA utilities.

Sincerely,

Physicians for Social Responsibility Florida Board of Directors

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⁴ ACEEE and PSR. 2018. *Saving Energy, Saving Lives: The Health Impacts of Avoiding Power Plant Pollution with Energy Efficiency*. <https://www.psr.org/wp-content/uploads/2018/04/renewables-report.compressed.pdf>.

⁵ ACEEE. 2019. *Utility-Sector Energy Efficiency Performance in Florida*. <http://aceee.org/fact-sheet/florida-utility-performance>.