

**Antonia Hover**

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**From:** Antonia Hover on behalf of Records Clerk  
**Sent:** Tuesday, October 01, 2019 10:57 AM  
**To:** 'Alan.Marshall@ocfl.net'  
**Cc:** Consumer Contact  
**Subject:** FW: Public Comment, Orange County, for Docket #20190019 (Commission review of numeric conservation goals (OUC))  
**Attachments:** FEECA Letter from CA.pdf

Good Morning, Mr. Marshall.

We will be placing Mr. Brooks' comments below in consumer correspondence in Docket Number 20190019, and forwarding them to the Office of Consumer Assistance and Outreach.

Thank you!

Toni Hover  
Commission Deputy Clerk I  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399  
Phone: (850) 413-6467

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**From:** [Alan.Marshall@ocfl.net](mailto:Alan.Marshall@ocfl.net) [<mailto:Alan.Marshall@ocfl.net>]  
**Sent:** Monday, September 30, 2019 6:29 PM  
**To:** Records Clerk  
**Cc:** [Alan.Marshall@ocfl.net](mailto:Alan.Marshall@ocfl.net)  
**Subject:** Public Comment, Orange County, for Docket #20190019 (Commission review of numeric conservation goals (OUC))

Alan Marshall  
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*"Providing the highest level of services to build and foster healthy and sustainable communities"*

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September 26, 2019

Mr. Art Graham  
Chairman  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

***Florida Energy Efficiency and Conservation Act (FEECA) – Comment Submittal for General Comment  
Dockets: 20190018 (Duke Energy) and 20190019 (OUC)***

Dear Chairman Graham and Members of the Florida Public Service Commission (PSC):

Orange County respectfully requests that the PSC bolster efforts by utility providers throughout the State of Florida to increase their energy efficiency goals in the upcoming Florida Energy Efficiency and Conservation Act (FEECA) review. The 2019 FEECA proceedings before the PSC present an opportunity for substantial enhancement to energy conservation goals at a time when these needs are most critical.

Since 2005, Orange County Government has been committed to improving the energy efficiency of buildings throughout the County in an effort to reduce our greenhouse gas emissions and combat the effects of climate change within our communities. By the year 2040, population growth in Orange County is predicted to increase by more than 50 percent, adding to an already heavy energy burden in our region. In conjunction with population growth, the County must consider the energy needs of more than 75 million annual visitors, which is estimated as an additional 200,000 people utilizing and impacting available resources in the County each day. Accordingly, Orange County Mayor Jerry L. Demings has given renewed emphasis and priority to our local efforts to enhance our commitment to sustainability, recognizing that our utility partners are critical to achieving our goals.

To plan and prepare for this continually increasing demand, Orange County established a Sustainability Plan with goals and metrics set at reducing community energy use 50 percent by 2040, increasing renewable energy production 30 percent by 2020, and significantly reducing community-wide greenhouse gas emissions well beyond the 2.2 percent decrease already achieved. Energy efficiency is a critical and foundational aspect of achieving these goals, and the County respectfully asks your consideration in pursuing a greater level of commitment to these efforts by our local providers.

**Byron W. Brooks, A.I.C.P., County Administrator**  
201 South Rosalind Avenue • Reply To: Post Office Box 1393 • Orlando, Florida 32802-1393  
Telephone: 407-836-7370 • Fax: 407-836-7399  
Byron.Brooks@ocfl.net

The County would like to acknowledge the most recent commitment made by Orlando Utilities Commission to meet a 1% goal of conservation as a percent of retail sales as measured within their clean energy strategy. Thus, we realize a municipal-owned utility has the impetus to act and be more responsive to the community it serves. So, the PSC may want to focus more attention on investor-owned utilities in any statewide goal setting efforts.

Florida utilities can prioritize investments in energy conservation and efficiency programs, thus fostering an environment that encourages responsible energy use and education for our residents, tourists and businesses. Setting appropriate standards for utility companies is a critical step in the right direction towards accomplishing this goal. Additionally, re-evaluating the test measures for efficiency programs and adopting a test that assesses the system-wide benefits of efficiency would be advantageous. Together, these actions will ensure Florida remains sustainable and resilient for its residents, businesses and visitors. Thank you for your thoughtful consideration. Should you need additional information, please do not hesitate to contact me or the County's Sustainability Manager, Alan Marshall, 407-836-5884 or Alan.marshall@ocfl.net.

Respectfully,



Byron W. Brooks, AICP  
County Administrator

BB/rm

cc: Honorable Jerry L. Demings, Mayor, Orange County  
Roseann Harrington, Chief of Staff, Orange County  
Chris Testerman, Deputy County Administrator, Orange County  
Alan Marshall, Assistant to the Director/Sustainability Manager, Orange County