



Caryl Shuham  
Commissioner, District 1

September 24, 2020

Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

**Re: Docket No. 20200181**

Dear Chairman Clark and Commissioners Brown, Graham, Fay and Polmann:

We understand the Florida Public Service Commission has tasked its staff with exploring revisions to Commission rules that implement Florida's conservation goal setting law, the Florida Energy Efficiency and Conservation Act (FEECA). As part of this proposed rulemaking, we urge you to address head-on the core issues in FEECA that create roadblocks to capturing the lowest cost efficiency measures, and have led to dismal energy savings achievement in Florida relative to the rest of the country.<sup>1</sup>

Florida's practice of relying on cost effectiveness and screening methods - that no other state in the country uses - continues to lead to very low energy savings goals. Most recently this practice led many of the state's largest electric utilities to propose zero or near zero goals.

As local elected officials, we are frustrated by these results, as you should be as well. We are keenly aware of the important role that robust energy efficiency programs can play in our community. Efficiency programs help our residents reduce energy use and save money on power bills - keeping more dollars in the local economy rather than leaving the state to bring in fuels from elsewhere.

Efficiency programs help reduce the energy burden - the disproportionately higher percentage of income - that our most vulnerable low-income residents pay for power bills. Offering programs to address the needs of low-income families is more important than ever given the continuing economic fallout from the COVID-19 crisis. At this time, there are more than 600,000 Floridians in arrears on their electric bills laying bare that so many have unduly high bills in the first place.

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<sup>1</sup> Southern Alliance for Clean Energy, *Energy Efficiency in the Southeast*, 2019; See also ACEEE, *State Energy Efficiency Scorecard*, October 2019, p. 29. Florida ranks 44<sup>th</sup> out of 50 states in energy savings as a percentage of retail sales.

Energy efficiency is also the quickest, cheapest and cleanest way meet customer energy demand, and for local governments to meet our climate sustainability and resilience goals. But, when energy savings targets are set too low by the Commission, electric utilities underinvest in energy efficiency. This hinders our ability to both meet established local sustainability goals and also limits customer access to the most effective methods to reduce monthly power bills.

When FEECA was established in 1980, the legislature recognized the importance of both controlling the growth rates of electricity consumption and peak demand through conservation programs, and that doing so would protect the health, prosperity and welfare of the citizens of the state.<sup>2</sup> Their original intent rings even truer today, but decades-old practices used in setting the state's efficiency savings targets are outdated and only serve to trap people with excessive bills.

Energy efficiency policy is dynamic. Technologies and customer needs change. So should the Commission's outdated practices.

Therefore, in order to address core issues, we request that the Commission hold a scoping workshop(s) to receive broad public input about addressing a number of issues around FEECA, including but not limited to cost-effectiveness and screening practices used in the conservation goal setting process. We further request that the scoping workshop(s) are designed to encourage broad public input. We believe that this will lead to the best outcome, not only for the Commission, but for the state and its citizens.

Sincerely,



Caryl S. Shuham  
Commissioner, District 1

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<sup>2</sup> Section 366.81, Fla. Stat.



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