

Jacob Veughn

From: Jacob Veughn on behalf of Records Clerk
Sent: Friday, January 22, 2021 9:18 AM
To: 'Gloria Gonzalez'
Cc: Consumer Contact
Subject: FW: Public Comment, City of Largo for Docket No. 20200181 (Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities)
Attachments: Docket No. 20200181_FPSC_FEECA Letter.pdf

Good morning, Ms. Gonzalez,

I would be happy to place the attached corrected letter in consumer correspondence in Docket 20200181 and forward this information to the Office of Consumer Assistance and Outreach.

Jacob Veughn

Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
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850.413.6656

From: Gloria Gonzalez <ggonzale@largo.com>
Sent: Thursday, January 21, 2021 5:11 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Public Comment, City of Largo for Docket No. 20200181 (Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities)

Mr. Veughn, one more thing, if I may kindly ask of you. I would greatly appreciate if you could use the attached letter as I found a mistake on it and have corrected it. Thank you so much for everything!

Wishing you an enjoyable evening.

Respectfully,
Gloria Gonzalez, Executive Assistant
City of Largo | Office of the Mayor and Commission
ggonzale@largo.com | 727.587.6702 | Largo.com
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PO Box 296
Largo, FL 33779
Largo.com

January 21, 2021

Chairman Gary F. Clark
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: Docket No. 20200181, Proposed amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities

Dear Chairman Clark and Members of the Florida Public Service Commission,

Thank you for the opportunity to provide these comments on the Commission's proposed revisions to its Florida Energy Efficiency and Conservation Act (FEECA) rule.

As you may know, the City of Largo is committed to transitioning the organization to 100 percent renewable energy by 2035 and for the community by 2050. Through the Largo Environmental Action Plan, the City has a number of other initiatives that highlight the importance of energy efficiency and reduced energy demand.

These initiatives will improve the overall sustainability and resilience of our community in a number of ways:

- Mitigate the environmental, economic and public health impacts of climate change;
- Improve air and water quality;
- Build a healthy, sustainable, and more resilient future;
- Strengthen our economy and support more local jobs; and
- Protect public health, particularly of our most vulnerable community members.

Energy efficiency is a critical tool to help us achieve all of these outcomes. Despite robust efforts, local governments like ours are often constrained in how much we can do to drive down our total greenhouse gas (GHG) emissions footprint since our direct ability to optimize the sources of energy that power the economy is limited. Therefore, we have a significant interest in finding ways to systematically improve the emissions performance of our electricity system, including through the support of policies and programs that eliminate energy waste and reduce peak demand.

Additionally, energy efficiency programs help reduce the energy burden of our most vulnerable low-income residents. Given the continuing economic fallout from the COVID-19 crisis, programs that help consumers save money on their utility bills are more important than ever.

- Continued -



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As the Commission considers revisions to its FEECA rule, we respectfully request that you and your colleagues address the core policy issues causing Florida to lag behind the rest of the country when it comes to energy efficiency. Specifically, no other state in the country relies as heavily on the Rate Impact Measure (RIM) test to evaluate energy efficiency programs. Similarly, no other state in the country requires energy efficiency programs to demonstrate a return on investment in two years or less. Both of these practices led to disappointing results and caused Florida's utilities to propose zero or near-zero goals for energy efficiency during the prior FEECA goal-setting process.

The City of Largo is keenly aware of the important role that robust energy efficiency programs can play in our community. Indeed, efficiency programs can help our residents and businesses reduce their energy use, save money, create local, family-wage jobs that cannot be outsourced, and keep more dollars in the local economy.

For all of these reasons, the City of Largo respectfully urges the Commission to strengthen its energy efficiency policies and programs by:

- Using the total resource cost test (TRC) or the participant cost test (PCT) to evaluate the costs and benefits of energy efficiency, instead of the RIM test;
- Eliminating the "two-year payback screen" to evaluate energy efficiency investments; and
- Adopting policies to support new and expanded energy-saving programs for low-income Floridians, such as a minimum budget requirement for low-income programs; the incorporation of a benefit "adder" to evaluate the cost-effectiveness of low-income programs in order to effectively account for their health and safety benefits; and the creation of a low-income customer advisory board to guide the Commission and Florida's utilities in the design and implementation of low-income offerings.

On behalf of our State's electric consumers, I thank you in advance for your thoughtful consideration. If you should need additional information, please do not hesitate to contact me or the City's sustainability coordinator, Ms. Laura C. Thomas, at (727) 586-7424.

Sincerely,



Woody Brown
Mayor
CITY OF LARGO
wobrown@largo.com | (727) 587-6702



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