

**Antonia Hover**

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**From:** Antonia Hover on behalf of Records Clerk  
**Sent:** Tuesday, May 31, 2022 8:14 AM  
**To:** 'heaven@solarunitedneighbors.org'  
**Cc:** Consumer Contact  
**Subject:** FW: Docket 20220000 - Comments on the Ten Year Site Plan  
**Attachments:** TYSP Comments .pdf

Good Morning, Heaven Campbell.

We will be placing your comments below in consumer correspondence in Docket No. 20220000, 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

**From:** Heaven Campbell <heaven@solarunitedneighbors.org>  
**Sent:** Friday, May 27, 2022 5:20 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Docket 20220000 - Comments on the Ten Year Site Plan

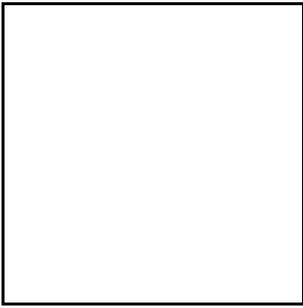
Good Afternoon,

Please find the attached comments on Ten Year Site Plans, for the June 1 workshop.

Best Regards,

Heaven Campbell

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**Heaven Campbell**  
Florida Program Director  
p: 904-701-4059  
Pronouns: she/her/hers



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Dear Public Service Commissioner and Staff,

Thank you for your hard work in ensuring a reliable and reasonable energy system for Floridians. I am the Florida Program Director of Solar United Neighbors. We represent 40,000 Floridians.

So many of our members in NW FL are, frankly, traumatized by rate hikes, due largely to gas volatility, and customer service and billing failures. Another point of stress has been the minimum bills from FPL and Duke Energy that have left families with large, long-term investments recalculating paybacks. That is why we are providing written comments on some of the anomalies we feel are in the TYSPs. The most glaring being an implausible winter load forecasting being requested by FPL. I would also posit that it is not a coincidence that they supported HB 741 with the “kill switch” provision of 6.5% of project DG penetration of summer peak load of a utility and are now proposing that they forecast large winter peaks. The implied devaluation of solar peak shavings is apparent.

I would like to specifically note that FPL predicts 1.2% of annual customer growth. This will amount to—just as we saw last year—more than all of their current net metered customers. This will continue the trend of extremely low DG penetration and minority ratepayer class representation.

Customers in JEA and still demanding the reinstatement of their net metering rate. Instead, JEA has touted their battery incentive sharing, “since its inception, over 370 residential storage systems have been installed.” This is unnecessarily vague and doesn’t share the monetary amount of incentives distributed or if all of those new battery installs have *received* the incentive or simply been connected to the grid.

Lastly, Lakeland Electric claims that customer-owned distributed generation “contributes to reduce system peak demand/energy avoiding the generation/purchase at higher cost. This helps to reduce the average cost of electricity to LE Customers. . .” and “has allowed the interconnection of these systems in a “net meter” fashion.” They fail to mention that they are seemingly the only utility in Florida with a residential demand charge that customers have testified cripples their families’ lifestyles.

We ask that the PSC more closely scrutinize the role of DG in TYSPs and respectfully believe that reasonable planning often excludes customer-level consideration from the utilities.