

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: June 17, 2022

TO: Adam J. Teitzman, Commission Clerk, Office of Commission Clerk

FROM: Jacob Imig, Attorney

RE: 20220000 Ten Year Site Plan Workshop Public Comment from Advanced Energy Economy, Alianza Centter, Catalyst Miami, CLEO Institute, Earth Ethics, Florida Clinicians for Climate Action, Healthcare Without Harm, Healthy Gulf, Rethink Energy Florida, League of Women Voters Pensacola Bay Area, and Solar United Neighbors

Please add the following letter regarding the Ten Year Site Plan Workshop from Advanced Energy Economy, Alianza Centter, Catalyst Miami, CLEO Institute, Earth Ethics, Florida Clinicians for Climate Action, Healthcare Without Harm, Healthy Gulf, Rethink Energy Florida, League of Women Voters Pensacola Bay Area, and Solar United Neighbors to the 20220000 docket.

Advanced Energy Economy, Alianza Center, Catalyst Miami, CLEO Institute, Earth Ethics, Florida Clinicians for Climate Action, Healthcare Without Harm, Healthy Gulf, Rethink Energy Florida, League of Women Voters Pensacola Bay Area, Solar United Neighbors

June 15, 2022

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

Re: FPL Ten Year Site Plan Comments; Docket No. 20220000

Dear Chairman Fay, Commissioners Graham, La Rosa, Clark and Passidomo:

We understand that as part of the annual Ten Year Site Plan process, the Commission must find a utility's plans as suitable or unsuitable. The undersigned organizations urge you to find FPL's extreme winter weather peak demand forecast in its 2022 Ten Year Site Plan unsuitable for the reason cited below.

FPL's new winter demand forecast is based on an extreme winter weather that is unlikely, if ever, to occur. FPL cites the Texas extreme winter weather event in 2021 as an example. Florida is not Texas. During the Texas winter weather event in 2021, temperatures dropped and stayed below freezing for 5 consecutive days, and some cities recorded lows below zero. There was significant snowfall, and ice accumulation of up to ½ inch. A lot of the problems in Texas stemmed from a number of unplanned gas units being offline, freeze related generation outages and gas fuel supply lines.

The Federal Energy Regulatory Commission (FERC) issued [recommendations](#) after the Texas winter weather event. Adding additional generation capacity, as FPL suggests in its plan, was not one of the FERC recommendations. FPL proposes keeping several gas units online that were slated for retirement, adding another 700 MW of gas generation, thousands of additional MW of battery storage, and transmission and distribution system winterization. The transmission and distribution improvements are projected to cost over \$450 million dollars alone.

When so many families are struggling with difficult choices between paying a power bill and buying medications or food, FPL's move to saddle customers with additional costs is untenable. Customers need relief now. The recent well-publicized FPL bill increases are hitting many families hard – exacerbating already high energy burdens. For instance, higher gas price costs passed on by FPL this year have spiked the fuel portion of power bills by 24% - impacting customers from Miami to Pensacola. FPL has signaled that it will come to the Commission again this year to pass on higher fuel costs to customers. These bill increases do not account for fuel and base rate increases in 2021.

While we recognize that FPL's grid was stressed by a few cold days in 1989 and 2010, its methodology of forecasting an extreme winter weather event in Florida and peak loads during that event is not transparent, nor a practice used by any other utility in the industry. FPL proposes to abandon its "business-as usual" traditional methodology for resource planning – which has served the Commission well in the past - and now base it on an extreme winter event, but attaches no probability of such an extreme event ever taking place. Its extreme event is based on temperatures even lower than those experienced in Florida in 1989 and 2010. It appears that FPL's forecasted electricity demand in response to this improbable extreme event did not use probabilistic simulations to determine whether its winter reserve margin meets resource adequacy criteria – like loss of load probability of once every ten years.

Moreover, FPL does not meaningfully consider energy efficiency and demand response as alternatives to its costly and unprecedented build, build, build approach. Instead FPL should focus on helping customers make their homes more efficient, safe and secure through energy efficiency measures – such as attic insulation, and provide more robust demand response programs. The system benefits of FPL increasing both the scale and depth of energy efficiency programs include less fuel needed to run its units and the deferral or elimination of additional power generation. In addition, these programs help customers reduce energy use and save money on their power bill. Yet, a 2020 American Council for an Energy Efficiency Economy [report](#) ranked FPL 51st out of the 52 largest US utilities in capturing energy savings from utility-sponsored energy efficiency programs.

We can and must do better to address the high power bills that so many Florida families are facing today. Adding more cost on them, as proposed in FPL's Ten Year Site Plan, for utility investments that are unsupported by standard industry practice to address an improbable extreme weather event, is not prudent, or responsible resource planning.

As part of your 2022 Ten Years Site Plan process, we urge you to find FPL's extreme winter peak demand forecast **unsuitable**.

Thank you,

Advanced Energy Economy
Michael J. Weiss, Policy Principal

Alianza Center
Marcos Vilar, President

Catalyst Miami
Natalia Brown, Climate Justice Program Manager

CLEO Institute
Yoca Arditi-Rocha, Executive Director

Earth Ethics

Mary Gutierrez, Scientist, Advocate

Florida Clinicians for Climate Action

Dr. Cheryl Holder and Dr. Ankush Bansal, Co-Chairs

Healthcare Without Harm

Catherine Toms, MD, MPH, Senior Advisor for Climate and Health

Healthy Gulf

Christian Wagley, Coastal Organizer, Florida-Alabama

League of Women Voters Pensacola Bay Area

Haley Richards, President

Rethink Energy Florida

Kim Ross, Executive Director

Solar United Neighbors of Florida

Heaven Campbell, Florida Program Director