

State of Florida



CORRESPONDENCE  
7/22/2022  
DOCUMENT NO. 04921-2022

## 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-**

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**DATE:** July 22, 2022  
**TO:** Adam Teitzman, Commission Clerk, Office of Commission Clerk  
**FROM:** Donald Phillips, Engineering Specialist, Division of Engineering *DP LK*  
**RE:** Docket No. 20220000-OT - Undocketed filings for 2022.

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Please file in the correspondence side of the above mentioned docket file the attached document, Pinellas County Administrator - Comment Request Response dated July 21, 2022, regarding the Review of the Ten-Year Site Plans.

DP/pz

Attachment



July 21, 2022

State of Florida Public Service Commission  
Attn: Donald Phillips, Engineering Specialist  
Capital Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Review of 2022 Ten-Year Site Plans for Florida's Electric Utilities**

Dear Mr. Phillips:

Thank you for the invitation to review the Ten-Year Site Plans (TYSP) for Florida's Electric Utilities. Pinellas County (County) is included in the Duke Energy Florida (DEF) electric utility service area. Hence, comments on the TYSP the focus of the County's review is specific to DEF's TYSP. The County has a keen interest in DEF's TYSP, as there remains a current Qualified Facility (QF) Power Purchase Agreement (PPA) in place between both parties for avoided electrical power capacity and the sale of electrical power from a municipal solid waste to energy facility. The PPA expires on December 31, 2024.

The County has questions, issues, and/or concerns with the following:

1. This plan forecasts the significant growth of seventeen (17) planned solar photovoltaic (PV) generation projects/sites totaling 3,100 MW by 2031. Nine (9) of the planned sites are essentially defined at 'TBD' and void of all economics. Yet, DEF has clearly detailed cost data for combustion turbine installations for the same forecast period.
2. The Pinellas Waste-to-Energy (WTE) facility is listed as 'Renewable MSW' but continues to use non-renewable natural gas fired combustion turbines as the basis of cost for avoided capacity calculations for a QF Standard Offer Contract. As listed as 'renewable', why not combine Renewable MSW into the same category as Renewable Solar and pay at the equivalent rates as avoided capacity for PV installations? The County strongly believes that all 'Renewables' should be treated on the same economic basis. This is especially true for Renewable MSW since it provides base load, highly reliable capacity, with a proven track record of over 30-years in the State of Florida.

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3. The plan indicates that most interest in QF sales is from PV developers with sixty (60) active projects and 4,4700 MW of interconnection requests and DEF is the project developer for thirteen (13) of the active projects. The plan documents do not elaborate on what constitutes an "active" project.
4. Pinellas County is one of the largest Clean Energy Connection municipal partners and would recommend DEF to consider large scale solar generation and/or battery energy storage in Pinellas County for grid resiliency and emergency management needs.
5. As a large customer of DEF's, the plan lacks program information that targets large customer assistance such as energy audits and automated software to assist with energy data transfer to energy management software. It is recommended that DEF joins other nationwide utilities to provide data transfer to systems such as the Energy STAR Portfolio Manager. Doing so will permit customers to better track consumption to compare to energy efficiency goals.

If you have any questions regarding the County's review, please contact Paul Sacco, Department of Solid Waste Director at 727-464-7514 or at [psacco@pinellascounty.org](mailto:psacco@pinellascounty.org).

Sincerely,



Barry A. Burton  
County Administrator

cc: Jill Silverboard, Deputy County Administrator/Chief of Staff  
Paul Sacco, Director, Department of Solid Waste