

**Nickalus Holmes**

---

**From:** Nickalus Holmes on behalf of Records Clerk  
**Sent:** Friday, June 6, 2025 12:38 PM  
**To:** 'David Walsh'  
**Cc:** Consumer Contact  
**Subject:** RE: FP&L rate case 20250011-EI

You're welcome.

Your corrected comments will be added to the docket. Have a great day

Nick Holmes  
Commission Deputy Clerk II  
Office of Commission Clerk  
Florida Public Service Commission  
850-413-6770

**From:** David Walsh <walsh@takotagroup.com>  
**Sent:** Friday, June 6, 2025 10:40 AM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Cc:** Consumer Contact <Contact@PSC.STATE.FL.US>  
**Subject:** Re: FP&L rate case 20250011-EI

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you.

Typographical and grammer errors corrected below highlighted in yellow.....

Dave Walsh

---

**From:** Nickalus Holmes <[NHolmes@psc.state.fl.us](mailto:NHolmes@psc.state.fl.us)> on behalf of Records Clerk <[CLERK@PSC.STATE.FL.US](mailto:CLERK@PSC.STATE.FL.US)>  
**Sent:** Friday, June 6, 2025 10:29 AM  
**To:** David Walsh <[walsh@takotagroup.com](mailto:walsh@takotagroup.com)>  
**Cc:** Consumer Contact <[Contact@PSC.STATE.FL.US](mailto:Contact@PSC.STATE.FL.US)>  
**Subject:** RE: FP&L rate case 20250011-EI

Good morning

We will be placing your comments below in consumer correspondence in Docket No. 20250011, and forwarding your comments to the Office of Consumer Assistance and Outreach.

Thank you,  
Nick Holmes  
Commission Deputy Clerk II  
Office of Commission Clerk  
Florida Public Service Commission  
850-413-6770

**From:** David Walsh <[walsh@takotagroup.com](mailto:walsh@takotagroup.com)>  
**Sent:** Friday, June 6, 2025 10:22 AM  
**To:** Records Clerk <[CLERK@PSC.STATE.FL.US](mailto:CLERK@PSC.STATE.FL.US)>; [Mike@larosacre.com](mailto:Mike@larosacre.com)  
**Subject:** Fw: FP&L rate case 20250011-EI

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To: FL PSC clerk and Mike Larosa:

Summary comments on this filing as an industry expert:

- The dominant majority of solar and battery storage capacity being proposed by FP&L within this rate case represents a non-diverse, solar and battery storage dominated power supply for Florida, particularly coupled with the fact that since 2018, all of the new capacity build here in the state by this firm has been solar and battery storage.
- Each FP&L solar farm, at 74.5 acres (all of them) according to their own filed 2024 ten year site plan, cost out at some \$98M per farm, after the application of PTC and ITC. This represents some 21MW in accredited actual net capacity when factoring known nightfall and cloudcover periods. Florida, as acknowledged within these plans has a 23% capacity factor for solar power (from US DOE Berkely National labs data. According to NREL data (US DOE) Florida has a very average 5.1 hour a day solar power generation time period, only slightly better than average across all US states.
- By example, a 24 hour a day 21MW Wartsila gas reciprocating engine plant would consume one acre, and the present capex cost of this capacity, with land, would be approx. \$24M.
- These FP&L solar farms, based upon the first fifty FP&L have erected, take some 680 acres each to provide only 21 net accredited MW per farm. In fact, the entire SERC-FL ten year plan calls for 299,000 acres to be devoted to the build out of 30,800 gross MW of solar, with battery storage representing some 91% of the new capacity in that plan.
- 90% of the thin film PV panels and battery storage and inverter devices in this plan would be Chinese sourced (albeit, via Jinko Solar's JAX based distribution center).
- Winter reserve margins collapse some 10 to 11% with the ten year site plan, due to the very part time nature of the operational time of these devices, with all power occurring effectively between 9:00AM and 4:30 PM, and on average, a 18.9 hr. per day physical power absence.

The reserve margin (the basic reliability metric) calculation used by FP&L is overstated by the use of two erroneous assumptions: .

One being the measurement point used by FP&L is only the momentary one point in time of assumed maximum demand occurring at five PM. The more accurate measurement of the peak demand period involves use of the entire period where the demand and supply "gap" are at minimum, which here in FL is the 4:30 PM through 7:30PM time period. The use of the far more liberal one point in time only assumption allows that diurnal battery storage assets (Operational only 2 hrs. per day) can offset a momentary shortage. The fact is, that while solar power declines some 89% during this full three hour period, electric power demand only declines some 10% during this same period. ERCOT and other grid regions now use this more precise demand and supply gap period measurement heuristic.

The second factor used to suppress the truer erosion in demand margins are the load forecast, or electricity demand growth forecast assumption over ten years used. The Florida Power & Light assumption is based on a 1.3% ten year CAGR in electricity demand growth. Most credible forecasts now have the national average at 2.5% per annum, (BCG, Mckinsey, Morgan Stanley, et. Al). Population and GDP growth estimates being the main driver of these projections.....Florida vastly exceeds the national average in projected population growth, and in GDP as well.

The other substantial, and I would project illegal assumption used is that the framers of the 1973 Florida statute allowing fast tracking (avec no land use, no environmental review, and most importantly no capacity auction to occur) on power generating facilities of under 75 MW each in rated capacity, should be used for essentially all of the new capacity additions occurring in Florida.

These solar farms areas, often even adjacent, collectively comprise an entire generating facility in terms of capacity. Solar has been 95% of Florida new capacity power generation since 2019, and across the 10 year plan.....all under the present interpretation of this non applicable statue, to the massive benefit of our regulated monopoly utilities.

**It was clearly not the intent of the framers of this original statute that 90% of Florida's ongoing annual new capacity generation plans would thus not be subject to a competitive auction process for other existing technology, and alternate power generation new capacity solutions.**

Respectfully submitted,

David M. Walsh

407-474-7117

[Walsh@takotagroup.com](mailto:Walsh@takotagroup.com)

Ret. President & CEO, Mitsubishi Power Systems Americas  
Contributing member, Heritage Project 2025 energy pillar team

---

**From:** David Walsh  
**Sent:** Wednesday, June 4, 2025 11:39 AM  
**To:** [Mike@larosacre.com](mailto:Mike@larosacre.com) <[Mike@larosacre.com](mailto:Mike@larosacre.com)>  
**Cc:** [m.carsongood@gmail.com](mailto:m.carsongood@gmail.com) <[m.carsongood@gmail.com](mailto:m.carsongood@gmail.com)>  
**Subject:** FP&L rate case

Mike:

Dave Walsh here.

Former President & CEO of Mitsubishi Power Systems Americas. Introduced to you via Carson, copied above.  
**The ongoing FPL record high rate case for \$10B should be held for further review....based on a wide**

**variety of essentially important issues regarding the preferred dominant choice of Power generation technology by FP&L.**

Mike...the overwhelming majority of FP&L's new power generation capacity across Florida since the 2017, and through the entire 2024-2034 (ten-year FP&L Florida site plan period) is neither in the interest of Florida ratepayers on a cost, reliability, nor energy quantity basis, nor the national security interest of our nation at large. This due to:

- The non diverse energy supply being added across the entire 17 year time period being some 90% utility scale solar and battery storage.
- The fact that the supply of these components being sourced via China. Recognizing the Jacksonville Jinko solar assembly factory is used to distribute and assemble Chinese components.
- The fact that this kind of power generation capacity is on a combined basis some 4-7X more costly in capex terms on an installed Kwh energy basis than natural gas fired combined cycle power.
- That the sheer land use case for this is deplorable, the current ten year FL-SERC filed site plans of Duke, Teco and FP&L will consume some 299,000 acres.
- And, that this will cause a sacrifice in winter electricity reserve margins by a full 10% as acknowledged by the utilities themselves, vastly expanding the probability of loss of load events occurring.
- The well known issue that the regional over-adoption of the solar power results in

**Florida desperately requires added, base load continuous duty generation be added in the near term. Recognizing the criticality of base load power on a national level, the CEO's of both Nextera and Duke Energy have concluded major gas turbine supply commitment's with GE Vernova very recently. Certain of these assets should be deployed in Florida, where that need exists as well for ratepayer, beyond the hyperscalers and Data center clients of these regulated Florida utilities.**

**The ongoing Florida electricity shortage is highlighted within recent ratepayer mailers of both major regulated utilities encouraging that electricity use be switched to midnight to five AM period and out of the peak five PM to nine PM summer period. This all due to the lack of buildout of base load, 24 hour a day plants , and the dominant part time solar resources being overapplied here.**

**The ten year SER-FL and FPL plans call for the shutdown of present badly needed coal and oil base load assets with the potential to generate nearly 60% the energy capacity of this new solar & battery resource. This shutdown should be reconsidered in the face of our urgent need for baseload power.**

**See the attached in support of addressing this set of challenges.**

In the slide deck....slides 3,4,5 27 and 28 should be of particular interest....most pointedly, per NREL (slide 5) and Berkely National labs data, Florida is only an average, not exceptional, US solar market. Slide 7 and 8 highlight the NERC reliability warning now issued, for reference here the warnings overlap the states with double the penetration of intermittent renewables versus the non-warning states. Slide 27 depicts the overwhelming capital cost of the 10-year Florida utility scale plan, versus equivalent energy basis gas fired power generation, along with the magnified impact of the proposed plant closedowns on Florida potential all in Kwh energy supply.

Lets meet and chatvery soon.

**Best Regards,  
Dave Walsh  
407-474-7117**