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From: Veronica Washington
Sent: Monday, June 10, 2019 2:56 PM
To: Commissioner Correspondence
Subject: FEECA Letter to the Florida Public Service Commission 2019
Attachments: FEECA Letter to FPSC _June 7 2019.pdf

Good afternoon

Please place the attached letter in Docket No. 20190018-EG.

Thanks

Veronica D. Washington

Executive Assistant to Commissioner Andrew Fay
Florida Public Service Commission
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From: Henley, Natalie [<mailto:NHenley@DunedinFL.Net>]
Sent: Friday, June 07, 2019 5:16 PM
To: Office Of Commissioner Graham
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Subject: FEECA Letter to the Florida Public Service Commission 2019

Chairman Graham,

The City of Dunedin is submitting a letter for the 2019 comment period for the Florida Energy Efficiency and Conservation Act (FEECA).

We greatly appreciate the Florida Public Service Commission's time and thoughtful consideration of our requests.

If you need further information, please contact our City Manager, Jennifer Bramley or myself.

Sincerely,

Natalie Henley
City of Dunedin, Sustainability Program Coordinator
Solid Waste & Recycling
1070 Virginia Street
Dunedin, FL 34698
P-727-298-3215 ext. 1324
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June 7th, 2019

Mr. Art Graham, Chairman
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399

**Florida Energy and Conservation Act (FEECA)-Comment Submittal for the
General Comment Period of 2019
Period Docket: 20190018-EG**

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

The Dunedin City Commission encourages the Florida Public Service Commission to enact higher energy efficiency standards for utility companies in the Florida Energy Efficiency and Conservation Act (FEECA).

Energy Efficiency in Florida

Energy efficiency in Florida lags behind the majority of other states; it is second to last in national results. The lack of energy efficiency in operations is visible in the majority of the utility companies in the state of Florida. This low level of efficiency is a product of low standards for utility companies. The City of Dunedin is requesting higher standards and stricter regulations to be placed on utility companies.

Currently, the national average for percent of retail sales going towards energy efficiency performance is 0.69%, the Southeast average is 0.29%, and further down is Florida at 0.13%. According to the 2018 Annual Report from *Energy Efficiency in the Southeast*, "The fact that the Southeast has among the highest energy bills in the country and the lowest energy efficiency performance points to a clear solution: Before spending customer dollars on more expensive power plants, it is time to first invest in all

cost-effective energy efficiency.” The priorities of Florida’s utility companies need to be transformed. Higher energy efficiency standards must be a priority in FEECA. Not only is this necessary for environmental protection, but is also feasible, which can be seen from various companies around the nation.

Florida’s Major Utilities

Florida’s four major utility companies are all below the Southeast utility average. Despite this case in Florida, major companies, such as Duke Energy, are actually above national averages elsewhere, such as in the Carolinas. The key idea to understand is that this is not a utility issue, it is a standard issue. If the state of Florida does not enforce higher standards for utility companies, efficiency will not be addressed by the utility companies. Not only are Florida companies lower than other states, but they have been continuing to lower their energy efficiency over the past few years, such is the case with Florida Power & Light.

Progressive Actions in Florida

Despite the case that all of Florida’s major utilities have low percentages, not all utility providers are inefficient. Orlando Utilities Commission (OUC), a municipal utility, had twice the percentage than that of the regional average and over 4.5 times higher than that of the state average, at 0.60% in 2017. It is also vital to note that the City of Orlando adopted a renewable energy commitment. This adopted resolution is one of numerous cities that have signed on for the Ready For 100 initiative. The City of Orlando understands this is where the future is headed, and it must start with actions in the present.

Commitments in Dunedin, FL

The City of Dunedin has been consistently progressing in terms of efficiency, sustainability commitments, and sustainable practices. The City has integrated environmentalism into their mission statement and uses these components to guide their decision making process. Two of the five City EPIC! Goals address this:

EPIC! Goal 3: Promote Dunedin as The Premier Coastal Community, protecting and improving our natural resources for the enjoyment of all.

EPIC! Goal 4: Be the statewide model for environmental sustainability stewardship.

On December 6th, 2018 the City unanimously voted to adopt the Ready for 100 Renewable Energy Commitment. The City has set goals to reach 100 percent renewable energy use in municipal buildings by 2035 and community wide by 2050.

Dunedin's drive towards the future incorporates best practices in sustainability. This drive is backed by a dedicated community that pushes the City to be more efficient by operating with sustainable practices.

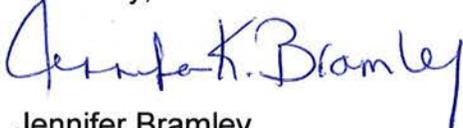
As Cities in the area and across the nation continue to implement and act on best practices, the City of Dunedin encourages businesses, corporations, schools, and organizations to do the same. Environmentalism cannot work if only one group is committed – it must be a conglomerate effort between all members of society.

Moving Forward

The City of Dunedin strives to enhance its practices and knows the Florida utility companies can achieve this too. It is recommended that higher energy efficiency standards for utility companies are created and enforced. This will in turn drive utility companies to transform their priorities towards sustainable practices, as well as create incentives for their customers to take actions to be more efficient in energy use, and have the overall energy industry running on best management practices.

I thank you for your thoughtful consideration. If you need further information, please do not hesitate to contact me or the City's Sustainability Coordinator, Natalie Henley, at 727-298-3215 ext. 1324.

Sincerely,



Jennifer Bramley

City Manager

CITY OF DUNEDIN

jbramley@dunedinfl.net

727-298-3003

c: Braulio L. Baez, Executive Director, Florida Public Service Commission
Chief Advisors to the Commissioner, Florida Public Service Commission
Lori Cross, Duke Energy, Director, Regulatory Strategy
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City of Dunedin Commission
Pinellas County Delegation of the Florida State Legislature
Lael Giebel, City of Dunedin, Assistant to the City Manager
Natalie Henley, City of Dunedin, Sustainability Program Coordinator
Deb Sheldon, Committee on Environmental Quality, Chair
Alan Brand, Committee on Environmental Quality, Member