

Achim Ginsberg-Klemmt, Chris Pierce, Darrell Prather, Geoffrey Dorney, Jeffrey Hill,
J. Robert Barnes, John Bachmeier, Paul Romanoski, Terry Langlois and Robert Winfield

Mr Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Undocketed

September 2nd 2019

Dear Mr Teitzman,

Please find attached our Joint Petition for Approval of Regulatory Improvements for decentralized
Solar-Net-Metering Systems in Florida.

Kind regards,

A handwritten signature in blue ink that reads "Achim Ginsberg-Klemmt" followed by a stylized star symbol.

Achim Ginsberg-Klemmt
Petitioner

3364 Tanglewood Dr,
Sarasota FL 34239
Email: achim@srqus.com
Phone: (941) 923 2419

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Joint Petition for Approval of) DOCKET NO. _____
Regulatory Improvements for decentralized)
Solar Net-Metering Systems in Florida) Filed: September 2nd, 2019
_____)

**JOINT PETITION FOR APPROVAL OF REGULATORY IMPROVEMENTS FOR
DECENTRALIZED SOLAR NET-METERING SYSTEMS IN FLORIDA**

Achim Ginsberg-Klemmt, Chris Pierce, Darrell Prather, Geoffrey Dorney, Jeffrey Hill, John Bachmeier, J. Robert Barnes, Paul Romanoski, Terry Langlois and Robert Winfield (“Petitioners”), pursuant to Section 366.04, Florida Statutes, petition the Public Service Commission for approval of regulatory improvements for decentralized solar net-metering systems in Florida and, as grounds therefor say:

1. The names, addresses, telephone numbers and email addresses of the Petitioners are:

Achim Ginsberg-Klemmt, 3364 Tanglewood Drive, Sarasota FL 34239
Phone: (941) 923-2419 email:achim@srqus.com

Chris Pierce, 781 Minerva Lane, Lake Mary, FL 32746
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Paul Romanoski, 1872 Umbrella Tree Dr, Edgewater, FL 32141
Phone:(703) 439-9352 email:paulromanoski@gmail.com

Terry Langlois, 2109 Hyde Park Cir, Sarasota, FL 34239
Phone: (941) 524-3985 email:dogonejack77@gmail.com

Robert Winfield, 2309 SE 12th St, Cape Coral, Florida 33990-19105
Phone: (301) 251-6671 email:winfield100@yahoo.com

2. Petitioners operate or are planning to install solar net-metering systems in the jurisdiction of the commission.

3. Unless individual service is required, all notices, pleadings and correspondence required to be served on the Petitioners should be directed to:

Achim Ginsberg-Klemmt
achim@srqus.com
3364 Tanglewood Drive
Sarasota FL 34239
(941) 923-2419

4. Supply and demand on the electric energy market in Florida is not regulated by competition between players with equal opportunities. A planned economy with one single supplier and fixed prices established by a governmental board has been the historical choice for this important section of our economy.

5. Electric utility companies in the State of Florida benefit from exclusive service areas protected from direct competition by third party electricity vendors.

6. Electric utility companies in Florida benefit from operating their business on vast acreages of utility easements located on public land without paying just compensation.

7. The historical entitlements stated under 5 & 6 should be rescinded and Florida's electric utility companies should owe just compensation to the public land owners.

8. Allowing the general public to operate solar net-metering systems without bureaucratic, regulatory interference by Florida's electric utility companies should be one way to compensate the general public for these exclusive entitlements.

9. Comparable Interconnect Agreements in other States on the West Coast of the United States limit Tier 1 net-metering systems to 100KW or even 1000KW, while Tier 1 systems in Florida are currently limited to 10KW!

10. Next to the unjustifiably strict limitation of 10KW for Tier1 net-metering systems, there is no scientific basis for demanding a dedicated liability insurance to protect the electric grid

from potential damages caused by small solar systems. Common electric circuit breakers are fully adequate to perform this important task.

WHEREFORE, Petitioners respectfully request that the Florida Public Service Commission raise the maximum allowed system size specified in the Tier 1 Interconnect Agreement for net-metered solar systems from 10KW to 50KW.

11. While Chapter 350 in the Florida Statutes grants the sole power & duty to regulate electric net-metering systems to the Public Service Commission, electric utility companies like Florida Power & Light, have essentially taken over this regulatory role on behalf of the PSC during the permitting process for new solar net-metering installations.

12. It is common practice today that electric utility companies in Florida limit the size of new solar net-metering installations to not exceed the past year's electricity usage measured at a particular account.

13. Florida Power & Light has taken this practice so far that potential customers or their contractors are obligated to specify technical components of the desired solar system into a web portal, while the FPL algorithm behind this web-portal decides which system passes and which one fails approval.

14. This pseudo official process forces potential net-metering customers to cripple the size of their solar systems and accrue additional cost if they need to to enlarge their unfairly limited inverters or solar arrays at a later point in time when their demand for electricity increases due to the purchase of an electric vehicle or any other high-usage electric device.

WHEREFORE, Petitioners respectfully ask the Public Service Commission to allow net-metering customers or their contractors to freely choose the size of their net-metering systems providing that the existing electric grid connection supports the requested size and the requested solar system fully complies with the applicable technical standards controlled and verified by the current building permit inspection process at the County level.

15. Photovoltaic solar systems produce electric power during hours of the day when it is most needed to match the hourly demand curve in Florida. Decentralized solar electric systems have the additional potential of raising the amount of clean, regenerative electric power production without using additional acreages of land needed for utility-size solar farms.

16. Homeowners should therefore be encouraged and officially supported to construct powerful decentralized solar net-metering systems in residential areas.

17. Such activity is in the public interest and especially desirable because decentralized solar systems are located close to the consumers and therefore avoid transmission loss and can substantially contribute to the general grid resilience against power outages when combined with a battery backup system or when combined with modern micro-grid capable inverter systems.

18. A substantial increase in monetary compensation for surplus solar electricity generated by decentralized net-metering systems is not a subsidy. This method is an adequate way to compensate the cost-free usage of public lands occupied by Florida's electric utility monopolies to operate the electric grid in their dedicated service areas.

19. An increased compensation is needed to encourage the production of surplus solar electricity by decentralized net-metering systems and needed to reflect the actual value of the peak-power generated by solar systems during the daytime.

WHEREFORE, Petitioners respectfully ask the Florida Public Service Commission to raise the minimum compensation for surplus solar electricity generated by decentralized solar net-metering systems to a minimum of \$0.08 per KWh.

Respectfully submitted this 2nd of September 2019

s/Achim Ginsberg-Klemmt
s/Christopher Pierce
s/Darrel Prather
s/Geoffrey P. Dorney
s/Jeffrey L. Hill
s/John Bachmeier
s/J.Robert Barnes
s/Paul Romanoski
s/Terry Langlois
s/Robert Winfield