









February 12, 2021

Chairman Gary F. Clark
Commissioner Julie Imanuel Brown
Commissioner Andrew Giles Fay
Commissioner Art Graham
Commissioner Mike La Rosa
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Dear Chairman Clark and Commissioners Brown, Fay, Graham, and La Rosa,

The Southeast Florida Regional Climate Change Compact (Compact), comprised of Broward County, Miami-Dade County, Monroe County, and Palm Beach County, represents over six million residents and is united on issues of climate and energy policy. The Compact requests that the Public Service Commission hold a second workshop on Docket Number 20200181 (Rule 25-17.0021, F.A.C., Goals for Electric Utilities) to expand the scope of the rulemaking to allow for a comprehensive evaluation of the energy-efficiency goal-setting process under the Florida Energy Efficiency and Conservation Act (FEECA) and to explore alternatives that might increase energy conservation in Florida and ease the energy burden on low- and moderate-income households.

This request is based on recommendations in the Compact's 2017 Regional Climate Action Plan (RCAP) and each county commission's approval of joint State Legislative Principles:

- Advance energy efficiency and conservation (RCAP Recommendation EF-02).
- Increase access to energy efficiency (RCAP Recommendation EF-03).
- SUPPORT all opportunities for renewable energy deployment and energy conservation in Florida, including policies to create renewable energy purchasing options, such as community solar and energy co-ops, and energy conservation incentives. (2021 Compact State Legislative Principles).
- SUPPORT a statewide renewable portfolio standard, stringent utility energy conservation targets, and meaningful renewable energy programs for electric utilities. (2021 Compact State Legislative Principles).

The Compact recognizes that energy efficiency and conservation are the most accessible and cost-effective ways to reduce energy consumption for residents and are therefore of particular importance to low-income community members. While average electricity rates in Florida may be some of the lowest, according to Commercial Buildings Energy Consumption data, we have

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some of the highest bills per square foot, largely due to our hot and humid climate. To meet this challenge, the Compact Counties sought and were awarded a grant to work with local partners to develop a regional energy-efficiency action plan for energy-burdened households.

We believe the state and its utilities must also rise to meet this challenge. Therefore, we respectfully request that the PSC expand the scope of the current rulemaking to include a comprehensive evaluation of the FEECA goal-setting process and results to date and exploration of alternatives, particularly those that would conserve more energy and benefit low-and moderate-income households.

Thank you for the opportunity to provide input on this rulemaking. We stand ready to assist in any way that we can. Should you wish to reach us, please contact Jason Liechty, the Compact's policy coordinator and Senior Environmental Project Coordinator with Broward County, at iliechty@broward.org or 954-519-0310.

Yours sincerely,

Jennifer Jurado, Ph.D.

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