

Tristan Davis

From: Tristan Davis on behalf of Records Clerk
Sent: Wednesday, October 8, 2025 12:56 PM
To: 'Valerie Giardini'
Cc: Consumer Contact
Subject: RE: FPL Proposed Rate Increase Docket 20250011

Good Afternoon,

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

Thank you!

Tristan Davis
Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Phone: (850) 413-6121

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From: Valerie Giardini <vga349@hotmail.com>
Sent: Wednesday, October 8, 2025 12:52 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: FPL Proposed Rate Increase Docket 20250011

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We, the Floridians for abundant, reliable 24/7, low cost & low footprint electricity, ask you to **reject** PSC Docket 20250011, FP&L's proposed \$9.0B rate hike.

Whereas:

1. From 2019 to 2025, Florida has experienced a lack of diversity in its new electric generating capacity, with regulated utilities solely investing in utility-scale solar and battery storage. The filed ten-year site plans within SERC Florida predict that 91% of new capacity additions from 2025 to 2034 will also consist of solar and battery storage (BESS). This equipment, primarily thin film PV and processed lithium battery components, is sourced from China and its sub-vendor countries. Reports from Fox News, Reuters, and a 2017 DOE Sandia lab evaluation have highlighted the presence of controlling sensors in Chinese-origin solar panels, power transformers, and inverters.
2. On average, this electrification method supports only about 5.2 hours of power generation per day in Florida, according to NREL. The DOE Berkeley National Labs reports that Florida Solar power's net

accredited capacity factor stands at just 23%. Consequently, the installed energy cost per kWh for Florida solar power is 8.5 times higher than that of advanced gas-fired combined cycle power technology installed during 2010-2019 and 4.25 times costlier than current combined cycle build cost estimates.

3. **The battery storage proposed in the ten-year site plans**, which is required to back up intermittent solar power for only 2-3 hours per day, **costs 3.9 times more than advanced combined cycle power**. The part-time and unreliable nature of these power sources will further strain Florida's winter and summer peak reserve margins by an estimated 10%, as per FP&L. Consequently, Florida's utilities are encouraging customers to reduce power demand during peak periods and shift usage to off-peak times.
4. **The Docket also implies that existing constant-duty, base load power plants across Florida will be decommissioned, leading to significant costs and a net reliability loss for ratepayers, as intermittent solar power will replace reliable sources.**
5. FP&L's 74.5MW solar farms require an average of 680 acres each, totaling approximately 192,000 acres in their ten-year site plan. In contrast, the same annual kWh capacity from combined cycle technology would only require about 66 acres.
6. **As more utility-scale solar farms are added in a region, their incremental capacity factor declines by up to 40%, according to MISO and WECC studies. This surge in solar and BESS capacity has historically led to significant rate increases and interim supply shortages in heavily affected markets like Western Europe, California, and Australia, ultimately harming consumer ratepayers and industries.** More cost-effective and proven technologies are available, as evidenced by recent awards to GE Vernova from Duke Energy and Nextera, targeting their hyperscaler and data center clients.

In light of these considerations, we strongly urge you to **reject** FP&L's costly plan to install a non-diversified supply dominated by solar and BESS technology across Florida. This plan poses significant economic, reliability, energy quantity, and land availability detriments to current and future Florida Power & Light ratepayers.

Valerie Giardini

4833 Hampshire Ct Apt. 102

Naples, FL 34112