



# EVERGLADES COALITION

## **A Resolution of the Everglades Coalition Encouraging the Florida Public Service Commission to Reform Its 30-Year-Old Energy Efficiency Goal Setting Economic Screening Practices in Order to Promote Higher Levels of Energy Savings**

**WHEREAS**, the Everglades ecosystem has competing demands for water, including from the power sector, and water quality and quantity are critical for Everglades restoration;

**WHEREAS**, energy efficiency is widely understood to be the cleanest, quickest and most cost-effective resource in meeting electricity demand;

**WHEREAS**, unlike conventional power generation, energy efficiency allows the utility to meet electricity demand with zero air emissions and no water use, thereby moving the state, and country to a cleaner and more sustainable and water-smart energy future;

**WHEREAS**, by reducing electricity demand, energy conservation reduces the need for the construction of new power plants and infrastructure that break up habitat and can impact water quality and quantity and reduces the operation of existing fossil fuel plants, not only lowering costs to customers but reducing greenhouse gas emissions, and air pollution that have a negative effect on public health and the environment;

**WHEREAS**, the Florida Legislature passed the Florida Energy Efficiency and Conservation Act (“FEECA”) in 1980 to reduce peak electricity demand and energy consumption<sup>1</sup>;

**WHEREAS**, the Florida Public Service Commission (PSC) is statutorily required to establish conservation goals for FEECA utilities and review such goals every five years, at a minimum;

**WHEREAS**, in turn, the utilities are required to develop cost-effective demand-side management plans that meet those goals and submit them to the PSC for approval; and

**WHEREAS**, in the most recent conservation goal setting proceeding in 2019, several large utilities filed proposed energy savings goals of zero or near zero;

**WHEREAS**, the utilities’ proposed goals were established by relying on economic screens such as the Rate Impact Measure (RIM) test and the 2-year payback screen that no other state in the nation relies

<sup>1</sup> Section 366.81, Fla. Stat.

upon for setting goals and has landed Florida near the bottom of state rankings on energy savings through utility efficiency programs<sup>2</sup>;

**WHEREAS**, the PSC has established a rulemaking docket to consider changes in the process by which conservation goals are set and customer programs are approved in the future<sup>3</sup>;

**WHEREAS**, the rulemaking process affords the PSC the unique opportunity to modernize its FEECA rules to end its reliance on these outdated economic screens and to increase the focus of conservation goals and programs to address meaningful energy savings opportunities and reduce the energy burdens of low to moderate income customers;

**WHEREAS**, reforming goal setting and approval of customers programs to national best practices in this area will generally lead to more robust energy efficiency programs offered to residential and commercial customers that will reduce energy waste and provide economic and environmental benefits;

**NOW THEREFORE BE IT RESOLVED ON JANUARY 26<sup>TH</sup> 2021:**

The Everglades Coalition, with its more than sixty member organizations committed to the protection and restoration of America's Everglades, hereby urges the PSC, through its conservation goal setting rulemaking process, to reform decades-old conservation goal setting practices to comport with national best practices in order to move the state to a more sustainable and water-smart clean energy future while also providing economic, environmental, and public health benefits.



Mark Perry  
Co-Chair



Marisa Carrozzo  
Co-Chair

<sup>2</sup> American Council for an Energy Efficient Economy, State Energy Efficiency Scorecard, December 2020, p. 32.

<sup>3</sup> Florida Public Service Commission, Docket No. 20200181