

Antonia Hover

From: Antonia Hover on behalf of Records Clerk
Sent: Thursday, April 30, 2020 12:19 PM
To: 'bmarshall@earthjustice.org'
Cc: Consumer Contact
Subject: FW: SACE Comments Docket No 20200058-EG
Attachments: SACE Comments Docket No 20200058.pdf

Good Afternoon, Attorney Marshall.

We will be placing your comments below in consumer correspondence in Docket No. 20200058, and forwarding them to the office of Consumer Assistance and Outreach. In addition, per your request, Southern Alliance for Clean Energy (SACE) will be added as an interested person to the docket.

Toni Hover

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From: Bradley Marshall <bmarshall@earthjustice.org>
Sent: Thursday, April 30, 2020 11:54 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Cc: Gabriella Passidomo <GPassido@psc.state.fl.us>; schef@gbwlegal.com; jlavvia@gbwlegal.com
Subject: SACE Comments Docket No 20200058-EG

Good morning,

Please find attached the Southern Alliance for Clean Energy's comments in relation to Docket No. 20200058-EG. Please add these comments to the docket as SACE's public comment. Please also add the Southern Alliance for Clean Energy (SACE) as an interested person, and please e-mail all notifications to bmarshall@earthjustice.org. If you have any questions, please do not hesitate to ask. Thank you.

Best,
Bradley

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of 2020) DOCKET NO. 20200058-EG
Demand-side management plan, by)
Orlando Utilities Commission)
_____)

COMMENTS BY SOUTHERN ALLIANCE FOR CLEAN ENERGY

Orlando Utilities Commission’s (“OUC”) petition for approval of its 2020 demand-side management plan continues to show the utility’s resistance to energy efficiency and conservation, demonstrates a lack of serious commitment to help its low-income customers, and lack of action on its public pledges. The City of Orlando, owner of OUC, has publicly committed itself to achieving 100% renewable energy by 2050. OUC will have to use meaningful amounts of energy efficiency and conservation to achieve that goal. Unfortunately, OUC’s petition shows a lack of commitment to achieving meaningful energy savings, coming nowhere close to OUC’s expected growth in energy sales.

Even worse, OUC’s overall lack of commitment to energy efficiency and conservation is its plan (or lack thereof) to help their low-income customers. In 2018, the year before the Public Service Commission set the goals for OUC as part of the goal-setting process pursuant to the Florida Energy Efficiency and Conservation Act (“Energy Efficiency Act”), OUC helped a total of 6 low-income households as part of the *Residential Efficiency Delivered* program. Other utilities in the state try to help 6 percent of their low-income customers per year. In contrast, by aiding just 6 of the approximately 85,000 low-income households in its territory,¹ OUC reached

¹ 40% of OUC’s residential customers have household incomes of less than \$35,000, which equates to about 85,000 customers. Moreover, each “customer” actually represents a utility account—an entire household or family—thus 85,000 customers actually represents hundreds of thousands of people.

just 0.007% of these same customers. OUC's proposed 2020 plan fails to meaningfully improve on past performance, aiming to help only 73 low-income customers per year, which is comparatively worse than that plan currently in place from 2015.

Besides having the smallest low-income program in the state, even as measured on a per capita basis,² OUC's approach is laden with other bizarre and harmful limitations. For instance, despite acknowledging during the goal-setting docket that a majority of its residential customers reside in multifamily dwellings, OUC has the singular distinction of restricting its low-income program to single-family homes. OUC also has the distinction of being the only utility subject to the Energy Efficiency Act to make its low-income customers pay extra to participate in a low-income energy efficiency program.

As explained in depth below, these deficiencies needlessly harm the households that most need the benefits of energy efficiency, and stand in stark contrast to OUC's public-facing image as a socially and environmentally responsible utility. Although OUC *claims* to lead when it comes to sustainability, its petition in this docket reveals that it actually *plans* to fall far behind. By refusing to help customers meaningfully reduce energy use—even though reducing energy use through efficiency and conservation has repeatedly been shown as the most cost-effective way to reduce fossil-fuel dependence while saving consumers money—OUC shows its true stance on sustainability. However, it is not too late, and OUC should still aim to be a progressive leader in line with the numerous public statements that OUC and the City of Orlando have made.

² Comparisons in these comments to other utilities includes the utilities that are subject to the Energy Efficiency Act goals-setting proceeding (except Florida Public Utilities Company) except where specifically noted otherwise.

BACKGROUND

Southern Alliance for Clean Energy (“SACE”) is a non-profit clean energy corporation organized under the laws of the state of Tennessee and authorized to conduct operations in the State of Florida. The mission of SACE, as reflected in its bylaws, is to advocate for energy plans, policies, and systems that best serve the environmental, public health, and economic interest of communities in the Southeast, including Florida. As part of that mission, SACE places a priority on evaluating all opportunities for displacing non-renewable electricity generation with lower cost end-use energy efficiency measures. These measures directly and cost-effectively reduce the amount of fossil fuels consumed by existing non-renewable energy generation facilities and displace the need for new power plants, thereby reducing the overall electric system costs for customers who ultimately bear the costs of fuel, new power plants and added infrastructure. Decreased fuel consumption also reduces the overall negative impacts to public health and the environment, as well as the economic costs associated with greenhouse gases emissions from non-renewable energy generation. In order to advance these interests, the Commission granted SACE’s petition to intervene in the most recent goal-setting proceeding for OUC. Order Granting Intervention, *In re: Commission review of numeric conservation goals (Orlando Utilities Commission)*, Docket No. 20190019-EG (hereinafter “OUC goal-setting docket”), Order No. PSC-2019-0137-PCO-EG (Fla. P.S.C. April 17, 2019). OUC’s demand-side management plan, at issue in this docket, is a direct result of that goal-setting process and includes OUC’s plan for reaching and implementing the goals.

The City of Orlando, the owner of OUC, has publicly committed itself to achieving 100% renewable energy by 2050 and being “the most sustainable city in the Southeast.” City of

Orlando, 100% Renewable Energy Resolution at 1, adopted August 8, 2017.³ OUC acknowledged this mandate in the demand side management goal-setting docket, claiming it “is a direct partner with the City of Orlando in the City’s efforts to become the greenest city in the southeastern U.S.” Orlando Utilities Commission’s Post-Hearing Statement and Brief at 28, OUC Goal-setting docket (Sept. 20, 2019) at 28. Nevertheless, arguing that OUC “offers a number of programs that promote energy conservation and peak demand reductions in both the residential and commercial/industrial sectors,” OUC “ask[ed] that the Commission set conservation goals of zero for OUC for summer and winter peak demand reductions, energy savings, and demand-side renewable energy measures for the goal-setting period 2020 through 2029.” *Id.* at 2, 4.

Similarly, in its 100% Renewable resolution, Orlando committed to including “low-income citizens in the benefits of renewable energy” and addressing the “pressing environmental justice challenges in sensitive communities in the City of Orlando.” 100% Renewable Energy Resolution at 1-2. In its testimony during the goals-setting process, OUC repeatedly pointed out that many of its customers are low-income. Hearing Transcript Volume 4 at 680, OUC goal-setting docket (Aug. 13, 2019) (testimony of Kevin M. Noonan, OUC Director of Legislative Affairs). As OUC testified, “low-income customers simply do not have the discretionary income to pay the customer’s cost to participate in a DSM program.” *Id.* at 681. In rebuttal testimony, Mr. Noonan testified that “OUC has implemented many efforts, including formal DSM programs and measures . . . that directly and substantially benefit low-income customers . . . and OUC is continuing to develop and implement additional measures and efforts.” Hearing Transcript

³ Available at <https://orlando.novusagenda.com/AgendaPublic/CoverSheet.aspx?ItemID=42540&MeetingID=922>.

Volume 7 at 1321, OUC goal-setting docket (Aug. 13, 2019). In this same docket, SACE proposed that OUC set specific low-income customer energy efficiency goals. Yet, despite its alleged efforts and concern, OUC repeatedly and vigorously rejected SACE's suggested "separate goals for low-income customers" as "clearly unnecessary for OUC in light of OUC's extensive program offerings directed to low-income customers, including OUC's Multifamily Efficiency Program as well as the Efficiency Delivered Program, and OUC's broad and numerous additional efforts and outreach activities." Orlando Utilities Commission's Post-Hearing Statement and Brief at 40.

SACE contested OUC's overall goals of zero, arguing to the Commission that zero was not a legally available option. *See, e.g.*, Southern Alliance for Clean Energy's and League of United Latin American Citizens' Post-Hearing Statement and Brief at 2, 47-49, OUC goal-setting docket (Fla. P.S.C. Sept. 20, 2019). After a multiple-day hearing, hundreds of exhibits, and hundreds of pages of briefing, the Commission rejected OUC's proposed goals of zero, finding "that it is in the public interest to continue with the goals set in the last FEECA proceeding." Final Order Approving Numeric Conservation Goals at 5, OUC goal-setting docket, Order No. PSC-2019-0509-FOF-EG (Fla. P.S.C. Nov. 26, 2019) (hereinafter "Goal-setting Order"). Consequently, the Commission ordered that residential and commercial/industrial peak demand (MW) and energy consumption (GWh) goals be set for OUC for each year from 2020-2024. *Id.* at 20.

On February 24, 2020, OUC filed its plan for meeting the goals set by this Commission. Orlando Utilities Commission's Petition for Approval of 2020 Demand Side Management Plan, Docket No. 20200058-EG (Fla. P.S.C. Feb. 24, 2020) (hereinafter "OUC plan"). As discussed below, OUC's demand-side management plan is not adequate for meeting the needs of its low-

income community and falls woefully short of what other utilities around the state are achieving – in fact, OUC is dead last when it comes to helping its low-income customers, no matter which way it is measured.

DISCUSSION

- A. OUC’s low-income program is the worst in the State, yet OUC plans to cut it to make it even worse.

Over 43% of the population in OUC’s service territory lives at or below 200% of the federal poverty level, the highest of all utilities subject to the Energy Efficiency Act. *See* Hearing Transcript Volume 5, *In re: Commission Review of Numeric Conservation Goals Orlando Utilities Commission*, Docket No. 20190019-EG, (Fla. P.S.C. Aug. 13, 2019) (testimony of SACE witness Forest Bradley-Wright). With a population of about 630,000 people,⁴ this would equate to about 270,000 people living at or below 200% of the federal poverty level. Meaningful energy efficiency programs are recognized as the best strategy for reducing high-energy burden. Their deployment should be scaled in both breadth and depth to truly and effectively improve conditions for OUC families struggling to pay monthly bills.

Moreover, Florida has some of the highest electricity bills in the nation due to our extraordinary energy usage – especially in the summer months. It is no coincidence that Florida has some of the highest energy usage when our energy efficiency programs and energy savings achievements are so small relative to savings captured by utilities in most other states. The result is high electricity bills that are unaffordable to many households. Florida’s severe underperformance on energy efficiency—in other words, cost savings to customers—is due to an

⁴ *See* 2020 OUC Ten Year Site Plan, schedule 2.1 at 12-3, projected population for 2020, available at <http://www.psc.state.fl.us/Files/PDF/Utilities/Electricgas/TenYearSitePlans/2020/Orlando%20Utilities%20Commission.pdf>.

inappropriate focus on electricity *rates*, rather than total *bills*. For low-income customers already facing high-energy bills, rates are not the pertinent issue—programs that reduce expensive energy waste are the real solution to high-energy bills.

The *Multifamily Efficiency Program* OUC discussed during the goal-setting process is nowhere to be found in OUC's demand-side management plan, only leaving its *Efficiency Delivered Program* for helping low-income customers. OUC plans to help just 73 of its low-income customers per year as part of its *Residential Efficiency Delivered* program, with savings of 823 kWh per participant (as measured at the generator). OUC plan at 2-16, 2-17. This amounts to a 0.9% cumulative penetration of eligible customers, with a total of 365 low-income customers assisted during the goal-setting period. *Id.* This also represents a significant cut from OUC's previous plan for *Efficiency Delivered*, where OUC planned to help 197 low-income customers per year, 2015 Petition for Approval of Modifications to Demand-Side Management Plan by Orlando Utilities Commission at 2-29, Docket No. 150088-EG (Fla. P.S.C. Mar. 16, 2015), but in practice saw years in which OUC helped as few as 6 customers. *See* OUC 2020 Annual Conservation Report at 3-12, *available at* <http://www.psc.state.fl.us/Files/PDF/Utilities/Electricgas/ARDemandSide/2019/Orlando%20Utilities%20Commission.pdf>. Critically, OUC does not report whether these customers were actually low-income, and as discussed before, eligibility is not limited to low-income customers. This begs the question: if OUC at times helped only 6 low-income households (assuming the households were even low-income) per year when it planned to help 197 households, will it help even less than 6 households in some years now that it plans to cut the program by more than 50%?

Even the 0.9% cumulative penetration rate is suspect, as OUC estimates there are a bit over 35,000 eligible customers. How OUC came up with this number of eligible customers is a mystery, but is probably due in part to OUC restricting the program to “residential customers (single family homes).” *Id.* at 2-13. Through this restriction to single-family homes, OUC appears to exclude the vast majority of low-income households from even being eligible for OUC’s one and only low-income program. Indeed, OUC has repeatedly pointed out that “[m]ore than 50 percent of OUC’s residential customers . . . live in multi-family residences.” Hearing Transcript Volume 4 at 680, OUC Goal-setting docket (Aug. 13, 2019) (testimony of Kevin Noonan on behalf of OUC). However, this explanation seems to be incomplete, because in its latest report on the program, OUC estimated that there were 60,000 eligible customers (still restricted to single-family homes). OUC 2020 Annual Conservation Report at 3-12. OUC has not provided any explanation for why the number of eligible customers is being cut in half by OUC (perhaps it is because OUC plans to cut this program in half). This is in contrast to all of the other utilities subject to the Energy Efficiency Act, which do include residences beyond single-family homes in their demand-side management program plans for low-income customers.⁵ It should again be noted that nothing about OUC’s program actually limits it to low-

⁵ See Tampa Electric Company’s Petition for Approval of Demand Side Management Plan at 98, Docket No. 20200053-EG (Fla. P.S.C. Feb. 19, 2020) (no restriction in low-income program to single family households); JEA’s Petition for Approval of Demand Side Management Plan at III-14, Docket No. 20200057-EG (Fla. P.S.C. Feb. 24, 2020) (no restriction in low-income program to single family households); Duke Energy Florida, LLC’s Petition for Approval of Proposed Demand-Side Management Plan at 17, 21, Docket No. 20200054-EG (Fla. P.S.C. Feb. 24, 2020) (no restriction in low-income programs to single family households); Petition for Approval of Florida Power & Light Company’s Demand-Side Management Plan at 17, Docket No. 20200056-EG (Fla. P.S.C. Feb. 24, 2020) (no restriction in low-income program to single family households); Gulf Power Company’s Petition for Approval of Proposed Demand-Side Management Plan at 12, Docket No. 20200055-EG (Fla. P.S.C. Feb. 24, 2020) (no restriction in low-income program to single family households).

income customers or a specific geographic area known to contain a high-concentration of low-income customers, unlike the low-income program offerings of all of the other utilities in the State.⁶ These omissions are all the more significant given OUC's refusal to track and report whether the customers it will help actually meet the definition for low income households.

Another fundamental flaw in OUC's plan is the requirement that low income customers pay to participate in the *Efficiency Delivered* program. OUC says that it recognizes that "low-income customers simply do not have the discretionary income to pay the customer's cost to participate in a DSM program." Hearing Transcript Volume 4 at 681, OUC Goal-setting docket (Aug. 13, 2019) (testimony of Keven Noonan on behalf of OUC). Yet, OUC expects its low-income customers to do exactly that – pay to participate in its DSM program, no matter how small their income or how much energy burden they face. OUC plan at 2-14. Again, OUC has the singular distinction of requiring low-income customers pay to participate in its low-income program, in sharp contrast to every other utility subject to the Energy Efficiency Act. Every other utility allows their low-income customers to participate in efficiency programs free of charge, because those utilities recognize that low-income customers do not have extra money to spend on efficiency measures.⁷ OUC also says that "[t]he purpose of the program is to reduce

⁶ See Tampa Electric Company's Petition for Approval of Demand Side Management Plan at 98, Docket No. 20200053-EG (Fla. P.S.C. Feb. 19, 2020) (low-income program offering limited to low-income neighborhoods); JEA's Petition for Approval of Demand Side Management Plan at III-14, Docket No. 20200057-EG (Fla. P.S.C. Feb. 24, 2020) (same); Duke Energy Florida, LLC's Petition for Approval of Proposed Demand-Side Management Plan at 17, 21, Docket No. 20200054-EG (Fla. P.S.C. Feb. 24, 2020) (same); Petition for Approval of Florida Power & Light Company's Demand-Side Management Plan at 17, Docket No. 20200056-EG (Fla. P.S.C. Feb. 24, 2020) (same); Gulf Power Company's Petition for Approval of Proposed Demand-Side Management Plan at 12, Docket No. 20200055-EG (Fla. P.S.C. Feb. 24, 2020) (same).

⁷ See Tampa Electric Company's Petition for Approval of Demand Side Management Plan at 98, Docket No. 20200053-EG (Fla. P.S.C. Feb. 19, 2020) (no charge for low-income customers to participate); JEA's Petition for Approval of Demand Side Management Plan at III-14, Docket

the energy and water costs especially for low-income households, particularly those households with elderly persons, disabled persons and children.” OUC plan at 2-14. Yet, OUC not only allows all households to participate, regardless of income, but prohibits low-income customers from participating if they are not current with their OUC bills. *Id.* In other words, OUC prevents the people who need the most help – those that cannot even afford their utility bills – from participating in the one program designed to help low-income customers lower their utility bills, even if those are low-income households with elderly persons, disabled persons, and/or children.

The plan to only help 365 low-income customers over five years (of whom, again, not all are even necessarily low-income) is woefully short of what other utilities are offering. TECO, which serves about 3.5 times more customers than OUC, plans to help 32,500 customers during the same period—almost one hundred times as many! *See* Tampa Electric Company’s Petition for Approval of Demand Side Management Plan at 101, Docket No. 20200053-EG (Fla. P.S.C. Feb. 19, 2020) (hereinafter “TECO plan”). TECO’s plan also calls for savings *per* low-income customer of more than twice what OUC proposes, with savings of 2,040 kWh per customer (measured at the generator). *Id.* at 103. While there is still a lot of room for improvement in TECO’s plan, OUC is falling far short even compared to other Florida utilities, like TECO. OUC can and must do better.

No. 20200057-EG (Fla. P.S.C. Feb. 24, 2020) (same); Duke Energy Florida, LLC’s Petition for Approval of Proposed Demand-Side Management Plan at 17, 21, Docket No. 20200054-EG (Fla. P.S.C. Feb. 24, 2020) (same); Petition for Approval of Florida Power & Light Company’s Demand-Side Management Plan at 17, Docket No. 20200056-EG (Fla. P.S.C. Feb. 24, 2020) (same); Gulf Power Company’s Petition for Approval of Proposed Demand-Side Management Plan at 12, Docket No. 20200055-EG (Fla. P.S.C. Feb. 24, 2020) (same).

While OUC proposes to serve less than 1% of its eligible low income population, TECO plans to reach 24.9% of the eligible customers in its low-income program by 2024. *Id.* This 24.9% is *on top* of the 26.0% TECO has already reached over the last five years. Tampa Electric Company's Summary of 2019 Demand Side Management Program Accomplishments at 13, *available at* <http://www.psc.state.fl.us/Files/PDF/Utilities/Electricgas/ARDemandSide/2019/Tampa%20Electric%20Company.pdf>. OUC should aim to do at least the same of helping 25% of its low-income customers over the next five-years (ideally, should aim to do even better), which would equate to an annual goal of assisting at least 4,700 customers, as opposed to 73 customers.⁸ Moreover, TECO is already saving low-income customers more than twice as much energy in its low-income program, but at a fraction of the cost compared to what OUC currently spends. *Compare* TECO Annual FEECA Report for 2019 at 13 (\$295 of cost per low-income customer installation with savings of 1,325 kWh)⁹ *with* OUC Annual FEECA Report for 2019 at 3-12 (\$1,064 of cost per low-income customer installation with savings of 603 kWh).¹⁰

Duke Energy Florida, in its demand-side management plan, has proposed two programs to help low-income customers. In its first program, Duke plans to save customers 3,747 kWh per customer (measured at the generator), and in its second program, it plans to save customers over

⁸ OUC has about 220,000 customers. Applying the 43% factor to calculate the number of customers at or below 200% of the poverty line yields about 95,000 customers. To reach 25% of that number over the next 5 years would require reaching about 4,730 low-income customers per year.

⁹ *Available at*

<http://www.psc.state.fl.us/Files/PDF/Utilities/Electricgas/ARDemandSide/2019/Tampa%20Electric%20Company.pdf>.

¹⁰ *Available at*

<http://www.psc.state.fl.us/Files/PDF/Utilities/Electricgas/ARDemandSide/2019/Orlando%20Utilities%20Commission.pdf>.

15,000 kWh per customer. *See* Duke Energy Florida, LLC's Petition for Approval of Proposed Demand-Side Management Plan at 20, 23, Docket No. 20200054-EG (Fla. P.S.C. Feb. 24, 2020). OUC should consider developing a deeper savings program like Duke's, which substantially improves the financial wellbeing of customers struggling the most with high-energy burdens. Regardless, OUC should at least aim for the lower of the Duke program numbers, saving 3,750 kWh per customer in its existing low-income program.

OUC reports that its low-income program is also much less cost-effective than other programs than the utilities around the state are offering, with a TRC score of 0.17, a RIM score of 0.14, and a Participant test score of 1.29. OUC plan at pdf page 208-210. Most low-income programs around the state have an infinite participant test score, as low-income customers are not expected to find the up-front capital costs to participate. A participant test score of 1.29 is not great when the need to help low-income customers is so high and participants can only expect around a 30% return on their investment from participation in OUC's Efficiency Delivered program. Why OUC's TRC and RIM scores are so low is a bit of a mystery, but it is certainly in part due to how OUC underestimates the benefits of its program. For example, while other utilities like TECO count benefits for the life of an efficiency measure, OUC only counts benefits for 10 years. *Compare* TECO plan at 104 *with* OUC plan at pdf page 200. Additionally, TECO counts avoided generation unit benefits and avoided transmission and distribution benefits, while OUC does not. *Compare* TECO plan at 105 *with* OUC plan at pdf page 208.

Despite undercounting of energy efficiency and conservation benefits, improvements to OUC's low-income program can be made cost-effectively; Duke has designed its program to deliver strong TRC cost effectiveness with a score of 3.91 and a 1.0 RIM score. Somehow,

looking at the TRC side of cost-effectiveness, Duke has made its much-more extensive program that provides much deeper level of savings to its low-income customers 23 times as cost-effective.¹¹

OUC should follow the example of other utilities in implementing cost-effective measures for low-income households that includes multi-family homes and renters. For example, as a starting point, OUC could add all of the measures included in TECO's program: walk-through energy audit; duct sealing; ceiling insulation; LED light bulbs; hot water pipe insulation; water heater temperature check and adjustment; low-flow faucet aerators; low flow showerheads; wall plate thermometer; refrigerator coil cleaning and brush; HVAC weather stripping kit (for window/wall HVAC units); air filter whistle (as a reminder to clean or change air filters monthly); and weatherization measures, including weather stripping, caulk and foam sealant to reduce or stop air infiltration around doors, windows, attic entries and where pipes enter the home. Tampa Electric Company's Petition for Approval of Demand Side Management Plan at 104-105, Docket No. 20200053-EG (Fla. P.S.C. Feb. 19, 2020).

B. OUC aims low for overall efficiency savings.

OUC's resistance to energy efficiency and energy conservation is not solely limited to its low-income customers (although OUC's determination to avoid helping its low-income customers is especially noteworthy and disturbing). Historically, OUC used to save 35 GWh per year, and even last year (2019) saved its customers 15.3 GWh per year. *See* OUC 2020 Annual Conservation Report at 3-4. These savings were heavily reliant on LED streetlighting and commercial/industrial lighting programs, which OUC should start to move away from (supplying 12 GWh of the savings from last year). *Id.* at 3-5. Now, OUC plans to save its customers only

¹¹ 3.91 divided by 0.17.

about 8.5 GWh per year. OUC Plan at 1-2. OUC expects an average of 7,115 GWh of annual sales through 2024, growing at about 100 GWh per year. *See* OUC 2020 Ten Year Site Plan at 12-4, *available at* <http://www.psc.state.fl.us/Files/PDF/Utilities/Electricgas/TenYearSitePlans/2020/Orlando%20Utilities%20Commission.pdf>. This means its planned savings do not even make a meaningful difference in the amount of growth OUC expects to have. This works out to a plan to save about 0.1% of annual retail sales per year, putting OUC towards the bottom of the nation in terms of energy sales savings. The current national average for utilities is savings 0.73% of retail sales per year, seven times what OUC plans to save. 2019 State Energy Efficiency Scorecard at 29, American Council for an Energy-Efficient Economy, *available at* <https://www.aceee.org/sites/default/files/publications/researchreports/u1908.pdf>. National leaders in utility energy efficiency save over 2% per year.

Not only does OUC's plan pale in comparison to what utilities are achieving nationally, it also puts OUC well-behind other utilities in Florida. In 2019, TECO saved its customers 91.4 GWh of energy, not even including the 19.6 GWh saved with its LED streetlight program. Tampa Electric Company's Summary of 2019 Demand Side Management Program Accomplishments at 1. TECO still plans to save an average of 63 GWh per year (over 7 times as much as OUC) through 2024. Tampa Electric Company's Petition for Approval of Demand Side Management Plan at 14, Docket No. 20200053-EG (Fla. P.S.C. Feb. 19, 2020). Over that time period, TECO expects average annual sales of 19,985 GWh. Tampa Electric Company Ten Year Site Plan at 35, *available at* <http://www.psc.state.fl.us/Files/PDF/Utilities/Electricgas/TenYearSitePlans/2020/Tampa%20Ele>

[ctric%20Company.pdf](#). This works out to 0.32% savings of retail sales per year, more than three times what OUC plans to achieve.

Although OUC *claims* to lead when it comes to sustainability, its petition in this docket reveals that it actually *plans* to fall far behind. By refusing to help customers meaningfully reduce energy use—even though reducing energy use through efficiency and conservation has repeatedly been shown as the most cost-effective way to reduce fossil-fuel dependence while saving consumers money—OUC shows its true stance on sustainability. Energy efficiency is the cheapest energy resource, and widely understood to be an essential part of a swift and affordable transition to 100% renewable energy. Simple cost-effective programs OUC could enact have already been enacted by other utilities. They include TECO’s *ENERGY STAR for New Multi-Family Residences* program (providing incentives to make sure new apartments and condominiums are ENERGY STAR certified), *ENERGY STAR Pool Pumps* program, *ENERGY DTAR Thermostats* program, *Residential Price Responsive Load Management* program (allowing customers to reduce energy bills by participating in a multi-tiered rate structure combined with smart thermostats), *Residential Window replacement* program, and many commercial/industrial programs that extend beyond lighting which seems to be OUC’s focus. See Tampa Electric Company’s Summary of 2019 Demand Side Management Program Accomplishments at 58-117. By failing to take advantage of cost-effective energy efficiency, OUC is failing to use the cheapest resource at its disposal, and turning its back on its customers and the City of Orlando’s stated goals.

CONCLUSION

OUC and the City of Orlando tout themselves as leaders when it comes to sustainability. But OUC’s petition in this docket does not live up to the standards the City of Orlando has set

for itself. OUC has completely failed its low-income customers, falling to last place in Florida. OUC must do better for the City of Orlando. The good news is that although OUC's plan falls woefully short of where it needs to be to help the people of Orlando, OUC can do better if it wants to. The Commission should encourage OUC to improve its low-income program to better serve the needs of its customers. SACE also implores OUC to voluntarily improve on this plan and come up with new programs to help its low-income population. As OUC itself has repeatedly stated, its low-income population desperately needs help. If OUC desires, it can provide that help.

Respectfully submitted this 30th day of April, 2020.

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