

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of FPL SolarTogether Program and Tariff, by Florida Power & Light Company. | Docket No. 20190061-EI
| Filed: January 3, 2020

FLORIDA POWER & LIGHT COMPANY'S PREHEARING STATEMENT

Florida Power & Light Company ("FPL"), pursuant to Order Nos. PSC-2019-0272-PCO-EI, PSC-2019-0399-PCO-EI and PSC-2019-0431-PCO-EI files with the Florida Public Service Commission ("Commission"), its Prehearing Statement.

1. FPL WITNESSES

Direct

WITNESS	SUBJECT MATTER	ISSUE #
Matthew Valle	Provides an overview of the FPL SolarTogether Program including description, objectives and benefits of the Program, comprising the basic principles underlying the structure and design of the Program and the customer interests served. The Program includes development of 1,490 MW ¹ of solar capacity. Participants voluntarily subscribe to a share of the output and receive a bill credit for their subscription share.	1, 4
William F. Brannen	Describes the technology, construction, operating characteristics, and overall cost and schedules of the 20 solar energy centers referenced in the FPL SolarTogether Program and demonstrates that the cost of components, engineering, and construction estimated for the FPL SolarTogether projects are reasonable.	5
Steven R. Sim ²	Presents FPL's economic analysis that shows that the FPL SolarTogether Program is cost-effective compared to adding no additional solar.	1
Scott R. Bores	Explains the financial modeling performed to calculate the charges and credits associated with the FPL SolarTogether Program.	3

¹ All references to capacity or generation in this prehearing statement are measured in alternating current.

² Dr. Steven R. Sim adopts the testimony and exhibits originally filed and sponsored by Juan Enjamio.

Rebuttal

<u>WITNESS</u>	<u>SUBJECT MATTER</u>	<u>ISSUE #</u>
Matthew Valle	Describes the updated Program pricing and sharing of benefits, with 55 percent allocated to participants and 45 percent to the general body of customers. Responds to Commission Staff witness Hinton’s contention that FPL SolarTogether is different in terms of cost recovery and the manner in which the generation is added. Rebut Office of Public Counsel (“OPC”) witness Dauphinais’s claim that FPL SolarTogether is “involuntary for non-participants.” Asserts that witness Dauphinais fails to acknowledge that the Program compares very favorably to private customer-owned solar. Affirms that using Power Purchase Agreements would have introduced significant uncertainties that could jeopardize the Program’s ability to meet customer demands.	1, 4
William F. Brannen	Rebut OPC witness Dauphinais’s speculation regarding affiliate-related work and asset transfers, confirming that the majority of the individuals assigned to work on FPL SolarTogether are FPL employees or contract personnel working under the direction of FPL. Confirms that FPL has been transparent about its competitive bid process, which is applicable to 98 percent of total construction costs, despite Vote Solar witness Cox’s assertions. Explains that FPL did not use a single Engineering, Procurement and Construction (“EPC”) agreement for Projects 3, 4 and 5, as FPL determined that the lowest EPC cost could be obtained by awarding construction contracts on an individual site basis.	5
Steven R. Sim	Rebut OPC witness Dauphinais’s contention that FPL has not demonstrated a resource addition need. Explains that the updated cost-effectiveness analysis contradicts the claims of witness Dauphinais that there is “nearly an equal likelihood” that the Program results in a loss or benefit to customers. Presents results of the updated analysis that shows CPVRR savings of approximately \$249 million, representing an increase of approximately \$110 million from the analysis provided in FPL’s petition. Explains that FPL’s cost-effectiveness analyses used in this docket utilizes the same methodology that FPL has used for all universal solar analyses previously presented to the Commission.	1

WITNESS

SUBJECT MATTER

ISSUE #

Scott R. Bores	Describes the financial modeling performed to calculate the charges and credits associated with the FPL SolarTogether Program pursuant to the updated economic analysis showing \$249 million in savings, with 55 percent (\$137 million) allocated to participants and 45 percent (\$112 million) to the general body of customers. Rebutting OPC witness Dauphinais, shows that allocating more than 100 percent of base revenue requirements to participants allows some of the benefits that accrue to the general body of customers to be fixed and that the allocation of benefits between participants and the general body of customers is reasonable. Explains why SolarTogether Projects 3, 4 and 5 are not eligible for allowance for funds used during construction.	3
Sam Shannon ³	Rebuts OPC witness Dauphinais’s claim that the general body of customers are subsidizing participants and explains that the Program’s levelized pricing structure and benefit allocation reduces risks faced by the general body of customers as compared to traditional community solar programs. Confirms that the general body of customers would still benefit even if the Program is not fully subscribed. Discusses the Program’s reasonableness and best practices of community solar programs and explains how community solar programs expand access to renewable energy.	2, 4
Terry Deason	Affirms that the Program structure is consistent with Commission policies on protecting all customers and preventing any undue preference or harm. Explains that the FPL SolarTogether Program is not a departure from the planning principles. Explains that the Program costs, benefits, and risks are fairly allocated. Asserts that the Program is a cost-effective approach which benefits all customers and enables large deployments of solar generation, which is consistent with Florida’s policy of promoting renewable energy.	2

³ Sam Shannon adopts the testimony originally filed by Lon Huber.

Supplemental Rebuttal

<u>WITNESS</u>	<u>SUBJECT MATTER</u>	<u>ISSUE #</u>
Steven R. Sim	Rebuts assertions made by OPC witness Dauphinais that FPL’s total reserve margin should not exceed 20 percent and provides support that the 20 percent reserve margin is intended to be a minimum criterion. Disagrees with witness Dauphinais that FPL did not reasonably quantify the Program’s current risk exposure and explains that FPL applied a robust risk/benefit analysis based on a well-established methodology that has been relied upon by the Commission in many dockets addressing the addition of large generation including universal solar facilities.	1
Matthew Valle	Refutes OPC witness Dauphinais’s contention that only the lowest cost resource option needed for reliability should be considered for new generation facilities and provides support that other factors such as economic need and fuel diversity can be considered. Addresses witness Dauphinais’s claim that the Program is not the most cost-effective solution for FPL’s customers as a whole and reiterates that under the Program, the general body of the customers is projected to share 45 percent of the savings, while paying none of the CPVRR of the program costs. Reiterates that SolarTogether and net metering complement one another, providing customers with a variety of options. Explains that the Settlement Agreement is in the public interest.	1, 4

2. EXHIBITS

Witness	Proffered By	Exhibit No.	Description	Issue #
Matthew Valle	FPL	MV-1	STR - Tariff No. 8.932 in Legislative and Proposed Formats	1, 3, 4
Matthew Valle	FPL	MV-2	STR – Revised Tariff No. 8.932 in Legislative and Proposed Formats	1, 3, 4
Matthew Valle	FPL	MV-3	Net Metering Subsidy	1
William F. Brannen	FPL	WFB-1	List of FPL Universal PV Solar Energy Centers in Service	5
William F. Brannen	FPL	WFB-2	Typical Solar Energy Center Block Diagram	5
William F. Brannen	FPL	WFB-3	Specifications for FPL SolarTogether Projects 1,2,3, and 4	5
William F. Brannen	FPL	WFB-4	Construction Schedules for the FPL SolarTogether Projects	5
Steven R. Sim	FPL	JE-1	Load Forecast	1, 3, 4

Witness	Proffered By	Exhibit No.	Description	Issue #
Steven R. Sim	FPL	JE-2	FPL Fuel Price Forecast	1, 3, 4
Steven R. Sim	FPL	JE-3	FPL Resource Plans	1, 3, 4
Steven R. Sim	FPL	JE-4	CPVRR - Costs and (Benefits)	1, 3, 4
Steven R. Sim	FPL	JE-5	Need Without New Generation Resources	1, 3, 4
Steven R. Sim	FPL	JE-6	Resource Plans	1, 3, 4
Steven R. Sim	FPL	JE-7	CPVRR	1, 3, 4
Steven R. Sim	FPL	JE-8	System Average Rate Impact	1, 3, 4
Steven R. Sim	FPL	JE-9	Sensitivity Analysis	1, 3, 4
Steven R. Sim	FPL	JE-10	Sensitivity Analysis - General Body of Customers	1, 3, 4
Scott R. Bores	FPL	SRB-1	Summary CVPRR Analysis for FPL SolarTogether Phase 1	1, 3, 4
Scott R. Bores	FPL	SRB-2	Updated CPVRR Analysis for FPL SolarTogether Phase 1	1, 3, 4
Terry Deason	FPL	JTD-1	Curriculum Vitae	

In addition to the above pre-filed exhibits, FPL reserves the right to utilize any exhibit introduced by any party. FPL additionally reserves the right to introduce any additional exhibit necessary for rebuttal, cross-examination, or impeachment at the final hearing.

3. STATEMENT OF BASIC POSITION

In 2006, Florida codified the State’s policy to promote the development of renewable energy. §366.92, Fla. Stat. (2019). In the thirteen years since the passage of Section 366.92, the cost of solar-powered energy has dropped significantly, and customer interest in obtaining their power from renewable resources has reached substantial proportions and continues to grow. Making the most of solar’s improved economics and technology advancements, FPL is operating more than 1,100 MW of cost-effective solar in Florida, with nearly 300 additional cost-effective megawatts currently under construction pursuant to the Commission-approved Solar Base Rate Adjustment mechanism. In terms of savings, these solar centers have been projected to save customers more than \$170 million CPVRR. FPL now looks to continue its efforts to further Florida’s leadership in promoting renewable energy by providing more direct access to the benefits of solar electricity to satisfy particularized customer interests and needs, at the same time that it brings new cost-effective resources on line for the benefit of all customers.

As a means to satisfy that customer need, FPL proposes the SolarTogether Program and Tariff STR – Original Sheets No. 8.932-8.934, which reflects the settlement reached by FPL, the Southern Alliance for Clean Energy (“SACE”), Walmart and Vote Solar. FPL SolarTogether is a community solar program through which participants can voluntarily subscribe to a share of capacity from 1,490 MW of Program-designated cost-effective solar energy centers that will be built, owned and operated by FPL. Over time, both participants and the general body of FPL customers are projected to achieve savings. In total, the centers are projected to generate \$249 million in customer savings, 55 percent of which will be allocated to participants and 45 percent will be allocated to the general body of FPL customers.

Participants will pay a monthly subscription charge designed to cover 104.5 percent of the Program base net revenue requirements, levelized at \$6.76 per kW to provide participants with a fixed cost over time, and in return will receive benefits in the form of bill credits for their subscription share of the power produced.

The customer desire for this Program is not only substantial but also demonstrable. Over the past several years, numerous FPL customers have inquired about the availability of renewable programs to meet their sustainability and financial goals. More and more, FPL customers want a greater percentage of the energy they consume to come from renewable sources – some even having established a policy to become 100 percent renewable – and they want to realize both the financial and sustainability benefits associated with solar energy. From November 2018 to January 2019, FPL reached out to its commercial, industrial and governmental customer accounts to provide information regarding the potential Program and an opportunity to reserve capacity (or “pre-register”) by signing contracts demonstrating their commitment to enroll. In just under 60 days, these customers reserved capacity totaling approximately 1,100 MW. Based on this response, the capacity will be allocated, at least initially, 75 percent (1,117.5 MW) to commercial, industrial and governmental customers and 25 percent (372.5 MW) to residential and small business customers. This is sized to fill most of the commitments entered into by commercial, industrial and governmental customers and would allow approximately 74,500 typical residential or small business customers to subscribe to 5 kW each (an amount roughly equivalent to 100 percent of average annual residential energy usage).

FPL SolarTogether is designed to expand access to solar to a broad cross-section of customers. Today, customers from all classes are interested in participating in community solar, but not everyone is able to access private solar. Barriers of private solar include high upfront costs, long-term commitments, lack of access to land or roof space, and unwanted maintenance obligations. FPL SolarTogether removes those barriers, thus expanding the ability to participate in solar in the state of Florida. All metered customers are eligible to participate for an initial small monthly premium. Participants can subscribe to the amount of capacity of their choosing up to 100 percent of their previous 12 months’ total kilowatt-hour usage, subject to available capacity. With no long-term commitment and no penalty for leaving, participants can terminate their participation at any time following their first month of enrollment. And, through the elements introduced in the Settlement Tariff, FPL SolarTogether opens even more doors by setting aside 37.5 MW for low income customers who wish to participate. This carve out would position Florida as a national leader in providing low income customers access to the benefits of solar energy.

The FPL SolarTogether centers are cost-effective compared to no additional solar and their costs are reasonable. Employing years of experience and its proven competitive procurement process, FPL was able to achieve low costs. The estimated construction cost for the 20 centers that comprise FPL SolarTogether amounts to an average of \$1,176 per kW.⁴ To determine the cost-effectiveness, FPL undertook the same economic analysis methodology it has presented to the Commission for all solar projects presented to and relied upon by the Commission since 2016. That analysis shows that installation of the 1,490 MW proposed for the SolarTogether centers included in the Program is projected to generate \$249 million CPVRR in net

⁴ This figure excludes AFUDC for SolarTogether Projects 3, 4 and 5.

benefits. Thus, based on the Program's 55 percent-45 percent benefit sharing, \$137 million is allocated to participants and \$112 million will benefit the general body of customers.

For all of these reasons, FPL SolarTogether and the Settlement Tariff are in the public interest and should be approved.

Surprisingly, OPC opposes FPL's request notwithstanding the substantial customer support in favor of the Program. First, OPC argues that the FPL SolarTogether Program should not be approved because FPL did not show that the 1,490 MW of proposed solar generation facilities would be the most cost-effective solution to meet a reliability need. But FPL is not proposing SolarTogether primarily to satisfy a capacity need for reliability purposes. The Program is designed principally to meet a tangible and growing customer need for greater and more direct participation in solar energy. In addition, the Power Plant Siting Act ("PPSA") does not apply to any of the Program facilities and, therefore, a capacity need within the strictures of the PPSA is not required. Nevertheless, the new solar facilities will in fact fully meet projected resource needs in the years 2020, 2021, and 2022, plus assist in meeting resource needs in later years. Second, OPC argues that the general body of customers is subsidizing the FPL SolarTogether participants. But this Program is not designed to impose net costs on the general body of customers. To the contrary, FPL SolarTogether is premised on an analysis that demonstrates that the Program is cost-effective, generating net incremental *benefits* (not costs) for all customers. Thus, customers wishing to receive more solar generation by participating in the FPL SolarTogether Program are not "cost causers" as that term is traditionally used; to the contrary, the Participants' subscription in the Program make available approximately \$112 million of CPVRR savings/benefits to the general body of customers.

4. STATEMENT OF ISSUES AND POSITIONS

ISSUE 1: Is FPL's proposed SolarTogether Rider tariff an appropriate mechanism to seek approval for the construction of 1,490 MW of new solar generation facilities?

FPL: Yes. The SolarTogether Rider tariff is the appropriate mechanism to allow customers to participate voluntarily and more directly in the development of solar energy in Florida. Customers are actively seeking a program like FPL SolarTogether in order to meet sustainability goals while also sharing in the financial benefits of solar. No existing programs or tariffs fill this customer need. FPL SolarTogether Program is designed to meet this significant customer demand, while accelerating the utilization of solar energy in Florida in a manner that is cost-effective for the general body of customers.

ISSUE 2: Does FPL’s proposed SolarTogether Rider tariff give any undue or unreasonable preference or advantage to any person or locality or subject the same to any undue or unreasonable prejudice or disadvantage in any respect, contrary to Section 366.03, Florida Statutes?

FPL: No. FPL’s proposed SolarTogether Rider tariff allows FPL customers - who cannot afford, do not wish to own, cannot place private solar on their home, or who live in a multi-unit dwelling or business - the opportunity to participate in the Program that allows access to cost-effective solar energy with no cross-subsidy regarding costs over the life of the Program. As a part of the Settlement Agreement, FPL will allocate 37.5 MW of the Program capacity for low-income customers with a separate tariff that will allow the low-income customers to receive net benefits from the outset of their participation. This added benefit provided to the Low-Income customers will be borne solely by the FPL customers who participate in the Program. The general body of customers will not be harmed by the program but instead, receive a share of the Program benefits. The program participants will pay 104.5 percent of the base revenue requirements, and receive 55 percent of the total CPVRR benefits. The general body of customers will benefit from 4.5 percent of the contribution in fixed base benefits, and 45 percent of the overall total CPVRR program savings.

ISSUE 3: Should the Commission allow recovery of all costs and expenses associated with FPL’s proposed SolarTogether Program in the manner proposed by FPL?

FPL: Yes. The FPL SolarTogether program is designed to benefit all customers. The costs and expenses associated with the construction and operation of the FPL SolarTogether centers and Program administration will be reflected as base rate recoverable costs. Over the life of the Program, FPL will recover 104.5 percent of the base rate recoverable costs through levelized subscription fees from the Program participants. Forty-five percent of the net benefits from the Program (inclusive of the 4.5 percent excess of revenue requirement) will be allocated to the general body of customers. Any unsubscribed capacity defaults to the general body of customers, and are allocated 100 percent of the benefits and pay 100 percent of the costs of the unsubscribed portion. The FPL SolarTogether benefits paid to the program participants will be recovered through FPL’s fuel cost recovery clause, partially offsetting system savings resulting from the addition of the Program’s solar power plants. As the program is cost-effective over the life of the assets, under-subscription will not adversely impact the non-participants.

ISSUE 4: Should the Commission approve FPL’s proposed SolarTogether Program and associated tariff, Rate Schedule STR , which is the same tariff attached as Attachment I to the Settlement Agreement filed October 9, 2019?

FPL: Yes. FPL’s Settlement Agreement with Vote Solar, Walmart and SACE (“settling parties”) represents a reasonable compromise of divergent positions and fully resolves all issues raised in this proceeding by these parties. Considered as a whole, the Settlement fairly and reasonably balances the interests of FPL’s general body of customers and the Program participants. Approving the Settlement Agreement is consistent with the Commission’s long-standing policy of encouraging the settlement of contested proceedings in a manner that benefits customers. In addition to all of the benefits of the FPL SolarTogether Program already demonstrated by FPL, the Commission’s approval of the Settlement would recognize the significant improvements to the Program offered by the settling parties through the addition of a new 37.5 MW low-income carve-out, which will allow those most financially disadvantaged the opportunity to lower their energy bills while joining others to expand the use of solar in Florida. The Settlement Agreement is in the public interest and should be approved.

ISSUE 5: What adjustments, if any, should the Commission make to any affiliate transaction costs associated with FPL’s Solar Together Rider tariff?

FPL: None. There have been no affiliate asset transfers involved in the development and construction of the FPL SolarTogether sites.

ISSUE 6: Should this docket be closed?

FPL: Yes. Upon issuance of an order approving FPL’s SolarTogether Program and Tariff, this docket should be closed.

CONTESTED ISSUE

OPC ISSUE A: Is FPL required to demonstrate a need for the solar generation facilities that will be constructed for SolarTogether and, if so, what need or needs are met by the SolarTogether program?

FPL: No. The FPL SolarTogether Program is not primarily driven on the basis of meeting a specific system resource need. However, the new solar facilities will fully meet projected resource needs in 2020, 2021, and 2022, and will assist in meeting resource needs in later years. The Program meets three broad needs while providing additional benefits to participants and the general body of customers: (1) a customer need that has been growing over the past several years for direct participation in additional renewables, (2) an economic need in that it is a cost-effective program that brings benefits to both participants and the general body of customers, (3) immediate resource needs in 2020 and 2021, plus helping to meet resource needs in future years, and also aligns closely with the resource plan presented in FPL's 2019 TYSP, and (4) improved fuel diversity.

5. STIPULATED ISSUES

FPL is not aware of any stipulated issues at this time. However, FPL remains willing and available to discuss settlement and/or stipulated facts and issues with the parties.

6. PENDING MOTIONS

1. Joint Motion to Approve the Settlement Agreement with FPL, SACE, Walmart, Inc. and Vote Solar [DN 09305-2019], dated October 9, 2019.

7. PENDING REQUESTS FOR CONFIDENTIALITY

1. FPL's request for confidential classification of information [DN 04381-2019] included in FPL's response to staff's first data request, filed May 17, 2019.
2. FPL's request for confidential classification [DN 04727-2019] of information included in FPL's response to staff's second data request (No. 2), filed June 4, 2019.
3. FPL's request for confidential classification of information [DN 05668-2019] included in FPL's response to staff's first set of interrogatories (Nos. 34, 96, and 147), filed July 18, 2019.
4. FPL's request for confidential classification of information [DN 08129-2019] included in FPL's response to OPC's Third Request for Production of Documents (No. 6), filed August 15, 2019.
5. FPL's request for confidential classification of information [DN 08181-2019] included in FPL's response to OPC's Fourth Set of Interrogatories (No. 22), filed August 16, 2019.

6. FPL's request for confidential classification of information [DN 08354-2019] included in FPL's response to OPC's Fifth Set of Interrogatories (No. 23) and Fourth Request for Production of Documents (No. 10), filed August 22, 2019.
7. FPL's request for confidential classification of information [DN 08432-2019] included in FPL's response to Staff's Second Set of Interrogatories (Nos. 166 and 186), filed August 26, 2019.
8. FPL's request for confidential classification of information [DN 08576-2019] included in FPL's response to Vote Solar's First Set of Interrogatories (No. 58), filed September 3, 2019.
9. FPL's request for confidential classification of information [DN 08629-2019 and DN 08630-2019] included in OPC's Sixth Request for Production of Documents (No. 15), filed September 9, 2019.
10. FPL's request for confidential classification of information [DN 08598-2019, 08676-2019 and 08744-2019] included in OPC's direct testimony and exhibits of witness James R. Dauphinais, filed September 12, 2019.
11. FPL's request for confidential classification of information [DN 08755-2019 and DN 08756-2019] included in FPL's response to Vote Solar's First Request for Production of Documents (No. 1), filed September 12, 2019.
12. FPL's request for confidential classification of information [DN 09282-2019] included in FPL's response to OPC's Seventh Request for Production of Documents (No. 23), filed October 08, 2019.
13. FPL's request for confidential classification of information [DN 09493-2019] included in FPL's response to OPC's Eleventh Request for Production of Documents (No. 52), filed October 21, 2019.
14. FPL's request for confidential classification of information [DN 09585-2019] included in FPL's response to OPC's Twelfth Request for Production of Documents (No. 56), filed October 24, 2019.
15. FPL's request for confidential classification of information [DN 11103-2019 and DN 11105-2019] included in FPL's response to OPC's Seventh Request for Production of Documents (No. 17) second supplemental, filed November 25, 2019.
16. FPL's request for confidential classification of information [DN 11468-2019] included in FPL's response to OPC's Second Request for Production of Documents (No. 3), filed December 23, 2019.

8. **OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT**

None at this time.

9. **REQUEST FOR SEQUESTRATION OF WITNESSES**

None at this time.

10. **STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE**

There are no requirements of the Order Establishing Procedure, as modified, with which FPL cannot comply.

Respectfully submitted this 3rd day of January 2020.

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CERTIFICATE OF SERVICE
Docket No. 20190061-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service on this 3rd day of January 2020 to the following:

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