

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
Company for Rate Unification and for Base
Rate Increase

Docket No. 20210015-EI
Date: March 31, 2021

**FLORIDA POWER & LIGHT COMPANY'S RESPONSE TO THE
AMENDED PETITION TO INTERVENE OF FLORIDA RISING**

Florida Power & Light Company ("FPL"), pursuant to Rule 28-106.204(1), Florida Administrative Code, hereby responds to the Amended Petition to Intervene by Florida Rising, filed on March 30, 2021 ("Amended Petition"). In support, FPL states:

1. On February 19, 2021, Florida Rising, the League of United Latin American Citizens, and the Environmental Confederation of Southwest Florida (together, "Petitioners") served a petition to intervene upon FPL and the Office of Public Counsel.

2. On February 22, 2021, Petitioners' petition to intervene was assigned a document number and was made available on the Commission's online docket.

3. On March 1, 2021, FPL filed a motion for leave to respond to the petition for intervention filed by the Petitioners and a response to the petition.

4. On March 8, 2021, Florida Rising filed a motion for leave to reply to FPL's response, arguing, among other things, that the subject matter of this proceeding is within Florida Rising's general scope of interest and activity.

5. On March 30, 2021, Florida Rising filed the Amended Petition, arguing that Florida Rising is an FPL customer and is authorized to represent its interests and the interests of its members in administrative proceedings such as this one.

6. FPL does not dispute that Florida Rising is an FPL customer, but FPL reserves the right to test Florida Rising's allegations of associational standing in discovery, should the Commission approve its intervention in that capacity.

Respectfully submitted this 31st day of March 2021.

FLORIDA POWER & LIGHT COMPANY

By: /s/ R. Wade Litchfield

R. Wade Litchfield

Vice President and General Counsel

Authorized House Counsel No. 0062190

wade.litchfield@fpl.com

John T. Burnett

Vice President and Deputy General Counsel

Florida Bar No. 173304

john.t.burnett@fpl.com

Russell Badders

Vice President and Associate General Counsel

Florida Bar No. 007455

russell.badders@nexteraenergy.com

Maria Jose Moncada

Senior Attorney

Florida Bar No. 0773301

maria.moncada@fpl.com

Florida Power & Light Company

700 Universe Boulevard

Juno Beach, Florida 33408-0420

(561) 691-7101

(561) 691-7135 (fax)

CERTIFICATE OF SERVICE
20210015-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 31st day of March 2021, to the following parties:

Suzanne Brownless
Bianca Lherisson
Shaw Stiller
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
sbrownle@psc.state.fl.us
blheriss@psc.state.fl.us
sstiller@psc.state.fl.us

Bradley Marshall
Jordan Luebke
Earthjustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, Florida 32301
bmarshall@earthjustice.org
jluebke@earthjustice.org
**Attorneys for League of United Latin
American Citizens of Florida,
Environmental Confederation of Southwest
Florida, and Florida Rising**

Office of Public Counsel
Richard Gentry
Patricia A. Christensen
c/o The Florida Legislature
111 W. Madison St., Rm 812
Tallahassee FL 32399-1400
gentry.richard@leg.state.fl.us
christensen.patty@leg.state.fl.us
**Attorneys for the Citizens
of the State of Florida**

By: /s/ R. Wade Litchfield
R. Wade Litchfield
Authorized House Counsel No. 0062190