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June 9, 2025

**VIA PSC E-FILE SYSTEM**

Adam Teitzman, Director  
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Office of the Commission Clerk  
Gerald L. Gunter Building, Suite 152  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

In Re: Docket No. 20250011-FL  
Americans For Affordable Clean Energy, Circle K, RaceTrac, and Wawa  
Petition to Intervene, Florida Power & Light Rate Case

Dear Mr. Teitzman:

Attached for filing is a Petition to Intervene (the "Petition") on behalf of Americans For Affordable Clean Energy, Circle K Stores, Inc., RaceTrac, Inc., and Wawa, Inc. in the above-referenced Florida Power & Light ("FPL") Rate Case docket. We will be separately filing testimony conditioned upon the granting of this Petition.

If you have any questions regarding this filing, please let me know. Thank you for your assistance.

Best regards,

BERGER SINGERMAN LLP



Floyd R. Self

FRS/CDA

cc: E-Service List

35074593-1

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

<b>In re: Petition for rate increase by Florida Power &amp; Light.</b>	) ) ) )	<b>Docket No. 20250011-EI</b>  <b>Filed: June 9, 2025</b>

**PETITION TO INTERVENE**

Americans for Affordable Clean Energy, Inc. (“AACE”), Circle K Stores, Inc. (“Circle K”), RaceTrac, Inc. (“RaceTrac”), and Wawa, Inc. (“Wawa”) (hereinafter, collectively, “Fuel Retailers” or “Intervenors”), pursuant to Sections 120.569 and 120.57(1), Florida Statutes, and Rule 28-106.205, Florida Administrative Code, hereby file this Petition to Intervene in the above-captioned docket, and in support thereof state as follows:

1.     **Party Identification.** The Fuel Retailers/Intervenors for this matter are:

Americans for Affordable Clean Energy, Inc.  
PO Box 15269  
Washington, DC 20003

Circle K Stores, Inc.  
1130 W. Warner Rd., Building B.  
Tempe, AZ 85284

RaceTrac, Inc.  
200 Galleria Parkway SE, Suite 900  
Atlanta, GA 30339

Wawa, Inc.  
260 W. Baltimore Pike  
Wawa, PA 19063

2. All pleadings, orders, notices, and other communications or filings in this docket should be provided to the following on behalf of the Fuel Retailers:

Floyd R. Self, B.C.S.  
Ruth Vafek, Esq.  
Berger Singerman, LLP  
313 North Monroe Street, Suite 301  
Tallahassee, FL 32301  
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3. **Affected Agency.** The affected agency is the Florida Public Service Commission (“PSC” or “Commission”), with a principal place of business at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

4. **Affected Party.** The affected utility in this docket is Florida Power & Light (“FPL”).

5. **Statement of Substantial Interests.** The Statement of Substantial Interests for each of the Fuel Retailers is as follows:

- a. **AACE.** AACE is an established nonprofit association of fuel retailers that includes Circle K, RaceTrac, and Wawa, each of which is also intervening in this matter with AACE. AACE’s intervention in this matter is on behalf of its five fuel retailer members in Florida, all of whom are FPL customers, representing more than 1,500 refueling locations across the state. AACE members include owners and operators of convenience stores, public travel facilities, and truck stops that provide fuel and other goods, services, and amenities at refueling stations throughout Florida and across the United States, primarily consisting of retail consumer goods, vehicle repair and service

products, food, and fuel. In addition, AACE members are among Florida's most sophisticated and forward-thinking fuel retailers. Currently, AACE members provide fuel for types of vehicles found on the nation's roads today. Electric service is instrumental to the ability of the AACE members operating in the FPL service area to offer any and all of their fuel and other services to Floridians and the larger traveling public. In essence, electric vehicle ("EV") charging for AACE members is just another type of transportation fuel, and EV charging is totally dependent upon receiving reliable and affordable electric service. Thus, the rates, terms and conditions governing the provision of electricity to AACE members in the FPL service territory, including the specific tariffs at issue in this case for EV charging provided by Fuel Retailers, will substantially and materially impact their ability to provide EV charging services and vehicle fueling services more broadly. Even more importantly, as the property owners and operators of sites at which EV charging stations have been or will be deployed, AACE members play a critical role in advancing the public policy goal of developing electricity fueled transportation through private investment, and the decisions in this docket will have a substantial and material impact on the ability of AACE members in the FPL area to deploy and offer EV charging stations and services. AACE was created in part to serve as an advocate on behalf of its fuel retailer members in proceedings such as this, and in fact AACE and the three individual companies joining in this intervention have all been granted intervenor status in both the Duke Energy Florida, LLC rate case, Docket No. 20240025-EI, as well as in the Tampa Electric Company rate case,

Docket No. 20240026-EI. In addition to these Florida rate cases, AACE has intervened and been a party in several other state utility Commission proceedings in Minnesota, Colorado, and South Carolina, which are more particularly described in the Fuel Retailers' prefiled testimony being filed concurrently and conditionally with this intervention request in order to comply with the procedural schedule set forth for this docket.

- b. **Circle K.** Circle K's success in the convenience retailing industry spans more than 60 years, beginning in Texas and growing across the U.S. and internationally. Today, Circle K is the global brand of Alimentation Couche-Tard, Inc. ("Couche-Tard"). Couche-Tard is a global leader in convenience and mobility, operating in over 20 countries, with more than 16,700 stores, of which approximately 13,100 offer road transportation fuel. It is one of the largest independent convenience store operators in the United States and it is a leader in the convenience store industry and road transportation fuel retail in Canada, Scandinavia, the Baltics, as well as in Ireland. It also has an important presence in Poland and Hong Kong Special Administrative Region of People's Republic of China and has recently expanded to Belgium, Germany, Luxembourg, and the Netherlands. More than 150,000 people are employed throughout its network. Circle K has approximately 200 locations across North America offering EV fast charging services. Currently, there are approximately 810 Circle K locations in Florida, of which, 256 are located within FPL's service territory, representing 319 accounts. The company currently is offering EV charging at three Florida locations, none of which are currently in the FPL

service area. Circle K's use of electricity makes Circle K a large retail customer of FPL, paying FPL substantial amounts for electric service each year. Circle K's further expansion of EV refueling stations within FPL's service territory is dependent, in part, upon the outcome of this docket.

- c. **RaceTrac.** RaceTrac is a privately held, family-owned business that has been serving guests since 1934. Together with its franchise-brand RaceWay, RaceTrac operates over 800 convenience stores and employs over 10,000 team members across its footprint. The company has been proudly serving Floridians for almost half a century. Currently, there are 295 stores (249 company-owned RaceTrac stores and 46 franchise-operated RaceWay stores) in Florida, which are supported by over 4,200 team members. RaceTrac has refueling stations located at the most convenient real estate for travelers, including many locations along alternative fuel corridors. Of its refueling stations, 110 are located within FPL's service territory, making RaceTrac a large retail customer of FPL, paying FPL substantial amounts for electric service each year. RaceTrac first began providing EV charging in 2023, and RaceTrac's first Florida location with EV charging will be operational in June 2025 in Groveland, Florida. RaceTrac is currently working toward three additional Florida locations with EV charging in the FPL service area, which would utilize the GSD-1EV tariff; the company anticipates using the GSLD-1EV tariff at locations that would provide more than two EV charging stations.
- d. **Wawa.** Wawa is a privately held, family-owned company that began as an iron foundry in 1803. As of 2023, Wawa was number 20 on Forbes' list of America's

largest private companies. Wawa operates more than 1,040 stores and employs over 46,000 team members across its footprint. Approximately 865 of these locations include motor vehicle refueling stations. The company has been proudly serving Floridians since 2012. Currently, there are 304 stores in Florida, which are supported by over 11,000 team members, and Wawa is continuing to actively expand in Florida. Of its Florida locations, Wawa has 113 locations within FPL's service territory, making Wawa a large retail customer of FPL, paying FPL substantial amounts for electric service each year. Wawa is offering EV charging at 73 locations, with 28 in the FPL service area.

6. **Further Information Regarding Substantial Interests of the Fuel Retailers.** In this docket, the Commission will consider FPL's request to increase rates paid by FPL customers, including each of the Fuel Retailers. Specifically, in its February 28, 2025, Petition for Rate Increase, FPL indicates an intention to seek a base rate increase of \$1,545 million, to be effective January 1, 2026, an additional increase in rates of \$927 million to be effective January 1, 2027, a return on common equity based upon an 11.90 midpoint for rate setting purposes, in addition to various other mechanisms and rate changes. Overall, the rate increases necessary to increase FPL's revenues will have a direct and substantial impact on FPL's customers, including each of the Fuel Retailers and their respective fuel retail centers throughout the FPL service area. Intervention on this basis alone as customers is demonstrated under Florida law.

7. In addition, FPL is proposing a number of different changes regarding its currently effective EV pilot tariffs. First, there is the FPL Utility-Owned Public Charging (rate schedule UEV or the "UEV Tariff"), that allows FPL to provide FPL-owned charging stations and collect fees for such usage. The availability of FPL-owned EV charging ports was significantly expanded in the

2021 rate case settlement, which authorized an investment of up to \$100 million over 2022-2025. Second and third, there is the Electric Vehicle Charging Infrastructure Riders, including the General Service Demand (“GSD-1EV”) and the General Service Large Demand (“GSLD-1EV”) tariffs, which enable third-party investment in public charging stations. These three pilot tariffs were approved for a five-year period, that will run through the end of 2025. There is also an EV Home Program pilot and a Commercial EV charging program that enables homes and certain commercial businesses to install FPL-owned charging equipment at their homes for personal vehicles or at certain commercial business for use by commercial fleet vehicles.

8. The business of the Fuel Retailers is selling fuel to provide power to vehicles, *see* section 377.707(1), Florida Statutes, and the Fuel Retailers are fuel agnostic given their roles as the primary providers of motor vehicle fuels to the public. As some parts of the motor vehicle industry transition to electricity as a fuel, the Fuel Retailers are currently providing EV charging services at some Florida locations, including some within the FPL service area as noted above, and a substantial number of AACE members, including and in addition to Circle K, RaceTrac, and Wawa, currently offer or are in the process of expanding or evaluating for deployment EV charging stations at their retail fuel stores in the FPL service area and elsewhere in Florida. In this regard, making permanent the GSD-1EV and the GSLD-1EV tariffs, and the corresponding rates, terms, and conditions of service that FPL is proposing in this case, will have a significant impact on whether the Fuel Retailers can reasonably and economically offer third party EV charging to the public.

9. FPL’s proposal to make permanent its UEV tariff program raises questions as to whether the FPL UEV program can meet the requirements of Section 366.94(4), which mandates that for a public utility’s voluntary electric vehicle charging program, the general body of

ratepayers, as a whole, will not pay to support recovery of the utility's electric vehicle charging investment by the end of the useful life of the investment. Whether this program complies with the statute will be a matter of first impression for this Commission. Compliance with Section 366.94(4) is squarely within this Commission's jurisdiction, and a determination by this Commission on this issue will impact the Fuel Retailers both as monopoly customers of FPL being forced to subsidize this service and as market competitors for EV public charging services. As FPL's UEV program has grown, its losses have been bigger each year, and it predicates making the UEV permanent based, in part, upon assumptions about grants and tax incentives that are no longer available or expected to continue. The Fuel Retailers experience in this space can provide the Commission with a unique perspective and expertise to help the Commission probe and assess the validity of FPL's assertions with respect to its UEV charging program.

10. As the EV market in Florida continues to develop and grow, it is imperative that there is a robust and affordable electric vehicle charging infrastructure in place to support Floridians and visitors during an evacuation. On this point, the Florida Legislature has made clear its intent that there be sufficient, reasonably priced fueling locations along evacuation routes. *See* § 252.135(2)(a)1., Fla. Stat.; *see also* § 339.287(1)(e), Fla. Stat. (providing legislative finding that having adequate, reliable charging stations along the State Highway System will also help with evacuations during hurricanes or other disasters). Fuel Retailers have the footprint, infrastructure, and experience to provide fueling support to motorists during hurricanes or other emergencies. Accordingly, the Fuel Retailers have a substantial interest in ensuring that the rates, terms, and conditions that FPL is proposing to charge third party EV charging fuel providers are such that Fuel Retailers can reasonably and economically offer third party EV charging to the public; this is especially important since FPL asserts that the price increase it is proposing for its public charging

services is “market-based.” AACE members are well-positioned to help the Commission make this assessment.

11. Given the status of Circle K, RaceTrac, and Wawa as large retail electric customers of FPL and the potential impacts to each of the Fuel Retailers, including the other AACE members that are fuel providers in the FPL service area, for the various EV service and rate tariff changes proposed by FPL that directly impact the Fuel Retailers, in addition to the issues raised by the extension of the FPL UEV program to permanent status, each of the Fuel Retailers individually meets the standard for intervention set forth in *Agrico Chemical Company v. Dep’t of Envtl. Reg.*, 406 So. 2d 478, 482 (Fla. 2d DCA 1981). The Commission has a long history of granting intervention to customers in rate proceedings, including these specific companies last year in the Duke Energy Florida and Tampa Electric Company rate cases. *See, more generally, e.g., In re: Petition for rate increase by Gulf Power Company*, Docket No. 130140-EI, Order No. PSC-13-0419-PCO-EI (Sept. 10, 2013) (granting intervention to large retail customer); *In re: Petition for increase in rates by Florida Power & Light Company*, Docket No. 120015-EI, Order No. PSC-12-0221-PCO-EI (April 26, 2012) (granting intervention to residential customers); *In Re: Petition for Rate Increase by Florida Power & Light*, Docket No. 080317-EI, Order No. PSC-08-0599-PCO-EI (Sept. 16, 2008) (granting intervention to association representing interests of retail customers). None of the other customers or customer groups that have requested intervention in this docket reflect the same types of business or business interests as the Fuel Retailers, and so they bring a unique and different perspective to this case not reflected by any other intervenor or petitioner for intervention.

12. **Association Standing.** The subject matter of this proceeding is well within AACE’s established scope of interest and activity. AACE routinely appears on behalf of its

members' interest in a variety of legislative, regulatory, and judicial proceedings. AACE's mission is to educate the public and advocate for consumer-focused low-carbon transportation energy policies. This mission includes the development and expansion of EV charging station infrastructure and related technology to communities throughout the United States in order to promote clean energy and a reduction in greenhouse gas emissions. As previously noted, AACE was granted intervention last year in the Duke Energy Florida and Tampa Electric Company rate cases. Moreover, as also discussed, AACE has been granted intervention in proceedings in numerous other states, including Colorado, Georgia, Louisiana, Minnesota, South Carolina, and Texas. While three of the members of AACE are seeking intervention in their own right in this case, there are other AACE members who are also FPL customers whose interests will be represented by AACE in this proceeding.

13. Under Florida law, to establish standing as an association representing its members' substantial interests, under *Florida Home Builders Ass'n v. Dep't of Labor and Employment Security*, 412 So. 2d 351, 353-54 (Fla. 1982), an association such as AACE must demonstrate three things: (A) that a substantial number of its members, although not necessarily a majority, are substantially affected by the agency's decisions; (B) that the intervention by the association is within the association's general scope of interest and activity; and (C) that the relief requested is of a type appropriate for an association to obtain on behalf of its members.

14. AACE satisfies all of these associational standing requirements.

- a. A substantial number of AACE's members are located in FPL's service area and receive electric service from FPL pursuant to Commission-approved rates that are at issue in this proceeding. In addition, AACE members have a direct interest in EV-related programs implemented by FPL.

- b. AACE exists to represent its members' interest in various venues, including matters before the Florida Public Service Commission, as demonstrated by AACE's participation in the previously noted Florida PSC rate cases last year and in regulatory proceedings in other states, which specifically include other state utility regulatory commissions.
- c. Finally, the relief requested by AACE is of the type appropriate for it to receive on behalf of its members pursuant to Rule 28-106.205(1), Florida Administrative Code. AACE seeks to intervene as a party of record with full rights to participate in all of the proceedings in this docket, joining three of its members who are also seeking intervention. All AACE members are electric customers who will be affected by the outcome of this proceeding. AACE members purchase electricity from FPL pursuant to various rate schedules that are at issue in this proceeding. AACE's participation is appropriate to ensure that the rates charged to AACE's members for electric service are fair, just, and reasonable. While some of the larger AACE members with business in the FPL service area are also individually intervening in this docket, AACE can support those individual companies through this concurrent or joint representation, and AACE can also provide a larger view and perspective to the Commission on behalf of those additional fuel retailers who are also FPL customers. While AACE, Circle K, RaceTrac, and Wawa shall speak with a single voice in this case, and take a single position on issues, those issues and single positions shall be reflective of all of the AACE members operating in the FPL service area. To that end, the Fuel Retailers intend to conduct discovery, cross examine

witnesses, raise issues of material fact and law, and take positions based upon what FPL seeks and how the relief requested in this docket substantially affects AACE's members, all of which are the types of matters that this proceeding is designed to protect.

15. **Notice of Proceeding.** Each of the Fuel Retailers received notice of this docket informally through the monitoring of Commission dockets.

16. **Statement of Position.** FPL must meet its burden of proof in this matter. The specific FPL tariffs that support the ability of Fuel Retailers to offer EV charging services should be made permanent and utilize rates, terms, and conditions are that fair, just, and reasonable. The FPL UEV tariff should not be made permanent since it cannot meet the statutory requirements in Section 366.94(4). The Fuel Retailers intend to conduct discovery and reserve the right to modify its positions based on information obtained during discovery or otherwise.

17. **Disputed Issues of Material Fact.** Fuel Retailers expect that the disputed issues of material fact will continue to be identified and refined in the course of these proceedings. Based upon the Fuel Retailers' review of the proceedings thus far, the disputed issues of material fact currently include, but are not limited to:

- a. Whether the increased base rates proposed by FPL are supported by competent substantial evidence of record.
- b. Whether the increased base rates proposed by FPL are fair, just, and reasonable.
- c. Whether FPL's proposed return on equity and capitalization structure are fair, just, and reasonable.
- d. Whether the assumptions underlying making the UEV pilot tariff permanent are reasonable and viable given current conditions.

- e. Whether the UEV pilot tariff should be made permanent, based upon whether it meets the requirements of Section 366.94(4).
- f. Whether the GSD-1EV and GSLD-1EV pilot tariffs, which the Fuel Retailers use, should be made permanent, and the appropriate rates, terms, and conditions of such service are appropriate.
- g. Whether the other proposed EV home and commercial EV charging programs are appropriate, and whether the proposed changes should be approved.
- h. Whether the \$5 million additional investment for technology and software, and the \$1 million for EV education is necessary, appropriate, and in the public interest.

The Fuel Retailers reserve the right to raise additional issues in accordance with the Commission's rules and the Order Establishing Procedure in this docket.

18. **Statement of Ultimate Facts Alleged and at Issue.** It is not possible to completely identify the ultimate facts to be proven since discovery is still underway. But based upon an identification of the issues thus far, the alleged ultimate facts include, but are not limited to, the following:

- a. Whether FPL has met its burden to prove that its proposed rates and charges, and its implementing tariffs, are fair, just, and reasonable.
- b. Whether FPL has met its burden to prove that it is entitled to any rate increases.
- c. Whether FPL's proposed return on equity and capitalization structure are fair, just, and reasonable.
- d. Whether the assumptions underlying making the UEV pilot tariff permanent are reasonable and viable given current conditions.

- e. Whether the UEV pilot tariff should be made permanent, based upon whether it meets the requirements of Section 366.94(4).
- f. Whether the GSD-1EV and GSLD-1EV pilot tariffs, which the Fuel Retailers use, should be made permanent, and the appropriate rates, terms, and conditions of such service are appropriate.
- g. Whether the other proposed EV home and commercial EV charging programs are appropriate, and whether the proposed changes should be approved.
- h. Whether the \$5 million additional investment for technology and software, and the \$1 million for EV education is necessary, appropriate, and in the public interest.

19. **Rules and Statutes Justifying Relief.** The rules and statutes that entitle each of the Fuel Retailers intervene and participate in this case include but are not limited to Sections 120.569, 120.57(1), 366.04, 366.041, 366.05, 366.06, 366.94, Florida Statutes, and Rules 28-106.201 and 28-106.205, Florida Administrative Code.

20. **Relief Requested.** The Fuel Retailers request that each be permitted to intervene as a full party in this docket. The Fuel Retailers intend to offer a uniform position and present a single case to the Commission.

21. **Statement Required by Rule 28-106.204(3).** Counsel for Fuel Retailers has conferred with counsel for FPL and is authorized to represent that FPL takes no position pending its review of the petition. Counsel has also conferred with counsel for the Office of the Public Counsel which takes no position. Undersigned counsel has emailed those other Parties of Record who have sought and been granted intervention, to advise of this Petition and the intent to intervene, and all have responded indicating they take no position on this intervention.

**WHEREFORE**, Americans for Affordable Clean Energy, Inc., Circle K Stores, Inc., RaceTrac Inc., and Wawa, Inc. request that the Commission enter an order allowing the Association and each member company to intervene and participate as a full party in the above-captioned docket.

RESPECTFULLY SUBMITTED this 9<sup>th</sup> day of June, 2025.

/s/ Floyd R. Self  
Floyd R. Self, B.C.S. (Fla. Bar No. 608025)  
Ruth Vafek, Esq. (Fla. Bar No. 34228)  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be served a copy of the foregoing document on the following persons via email as follows:

<b>Office of the General Counsel</b> Shaw Stiller, (850) 413-6187 Timothy Sparks, (850) 413-6216	<b>Office of Industry Development &amp; Market Analysis</b> Eric Hitchins, (850) 413-6084 Eric Wooten, (850) 413-6546 Shelby Eichler, (850) 413-6978
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<p><b>Division of Engineering</b>  Ailynee Ramirez-Abundez, (850) 413-6974  Clayton Lewis, (850) 413-6578  Gary Smith II, (850) 413-7003  Laura King, (850) 413-6588  Marissa Ramos, (850) 413-6473  Orlando Wooten, (850) 413-6686  Penelope Buys, (850) 413-6518  Phillip Davis, (850) 413-6582  Phillip Ellis, (850) 413-6626  Segundo Sanchez, (850) 413-6226  Takira Thompson, (850) 413-6592</p>	<p><b>Division of Economics</b>  Bria Pope, (850) 413-6568  Cecilia Galloway, (850) 413-6922  Christopher Richards, (850) 413-6742  Corey Hampson, (850) 413-6676  Devan Prewett, (850) 413-6078  Edwin Kunkler, (850) 413-6648  Elisabeth Draper, (850) 413-6706  Jenny Wu, (850) 413-7005  Michael Barrett, (850) 413-6544  Patrick Kelley, (850) 413-6495  Shannon Hudson, (850) 413-7021  William McNulty, (850) 413-6848</p>
<p><b>Division of Accounting &amp; Finance</b>  Aiyana Holloway, (850) 413-6802  Amber Norris, (850) 413-6984  Andrew Souchik, (850) 413-7019  April Teichler, (850) 413-6285  Cassandra Gatlin, (850) 413-6420  Dale Buys, (850) 413-6536  Devlin Higgins, (850) 413-6433  Ian Mason, (850) 413-6914  Javier Ferrer, (850) 413-6534  Jerrat McGowan, (850) 413-6946  Joshua Cohn, (850) 413-6068  Karesha Hinson, (850) 413-6642  Mark Cicchetti, (850) 413-6066  Matthew Vogel, (850) 413-6453  Scott Quigley, (850) 413-6287</p>	<p><b>Commission Suite</b>  All Commissioners -- Hearing Officer(s)  Michael La Rosa -- Pre-Hearing Officer,  (850) 413-6044</p>
<p><b>Florida Power &amp; Light Company</b>  Kenneth A. Hoffman  134 West Jefferson Street  Tallahassee FL 32301-1713  (850) 521-3901  (850) 521-3939  ken.hoffman@fpl.com</p>	<p><b>Florida Power &amp; Light Company</b>  J. Burnett/M. Moncada/C. Wright/W. Cox/J. Baker  700 Universe Boulevard  Juno Beach FL 33408-0420  (561) 304-5253  (561) 691-7135  maria.moncada@fpl.com  john.t.burnett@fpl.com  christopher.wright@fpl.com  will.p.cox@fpl.com  joel.baker@fpl.com</p>

<p><b>Office of Public Counsel (25)</b>  Walt Trierweiler/Mary A. Wessling  c/o The Florida Legislature  111 W. Madison Street, Suite 812  Tallahassee FL 32399-1400  wessling.mary@leg.state.fl.us</p>	<p><b>Federal Executive Agencies (25)</b>  L. Newton/A. George/T. Jernigan/J. Ely/M.  Rivera/E. Payton  139 Barnes Drive, Suite 1  Tyndall AFB FL 32403  (850) 283-6347  Ashley.George.4@us.af.mil  ebony.payton.ctr@us.af.mil  Leslie.Newton.1@us.af.mil  Michael.Rivera.51@us.af.mil  thomas.jernigan.3@us.af.mil  james.ely@us.af.mil</p>
<p><b>Florida Industrial Power Users Group (25b)</b>  Jon C. Moyle, Jr./Karen A. Putnal  c/o Moyle Law Firm  118 North Gadsden Street  Tallahassee FL 32301  (850) 681-3828  (850) 681-8788  jmoyle@moylelaw.com  mqualls@moylelaw.com  kputnal@moylelaw.com</p>	<p><b>Florida Energy for Innovation Association (25)</b>  1700 Flamingo Drive  Orlando FL 32803-1911  (407) 947-0877  Contact@EnergyForInnovation.org  <b>Represented By:</b> Holland Law Firm</p>
<p><b>Keyes Law Firm (25 Vijaykar)</b>  Nikhil Vijaykar  580 California St., 12th Floor  San Francisco CA 94104  (408) 621-3256  nvijaykar@keyesfox.com  <b>Represents:</b> EVgo Services, LLC</p>	<p><b>Spilman Law Firm (25 NC)</b>  <b>Stephanie U. Eaton</b>  110 Oakwood Drive, Suite 500  Winston-Salem NC 27103  (336) 631-1062  (336) 725-4476  seaton@spilmanlaw.com  <b>Represents:</b> Walmart Inc.</p>

<p><b>Holland Law Firm (25)</b>  D. Bruce May/Kevin W. Cox/Kathryn Isted  315 South Calhoun Street, Suite 600  Tallahassee FL 32301  (850) 224-7000  bruce.may@hklaw.com  kevin.cox@hklaw.com  kathryn.isted@hklaw.com  <b>Represents:</b> Florida Energy for Innovation Association</p>	<p><b>Spilman Law Firm (25 PA)</b>  Steven W. Lee  1100 Bent Creek Boulevard, Suite 101  Mechanicsburg PA 17050  (717) 791-2012  (717) 795-2743  slee@spilmanlaw.com  <b>Represents:</b> Walmart Inc.</p>
<p><b>Southern Alliance for Clean Energy (25)</b>  P.O. Box 1842  Knoxville TN 37901  (865) 637-6055  <b>Represented By:</b> Garner Law Firm</p>	<p><b>League of United Latin American Citizens of Florida (25)</b>  100 South Belcher Road #4752  Clearwater FL 33765  <b>Represented By:</b> Earthjustice</p>
<p><b>Garner Law Firm (25)</b>  William C. Garner  3425 Bannerman Road  Tallahassee FL 32312  (850) 320-1701  (850) 792-6011  bgarner@wcglawoffice.com  <b>Represents:</b> Southern Alliance for Clean Energy</p>	<p><b>Florida Rising, Inc. (25)</b>  10800 Biscayne Blvd., Suite 1050  Miami FL 33161  <b>Represented By:</b> Earthjustice</p>

<p><b>Florida Retail Federation (25)</b>          Lorena Holley          227 South Adams St.          Tallahassee FL 32301          (850) 222-4082          lorena@frf.org  <b>Represented By:</b> Stone Law Firm</p>	<p><b>Stone Law Firm (25a)</b>  <b>J. Brew/L. Baker/J. Briscar/S. Newman</b>  <b>1025 Thomas Jefferson St., NW, Suite 800</b>  <b>West</b>  <b>Washington DC 20007</b>  <b>(202) 342-0800</b>  <b>(202) 342-0807</b>  <b>jbrew@smxblaw.com</b>  <b>lwb@smxblaw.com</b>  <b>jrb@smxblaw.com</b>  <b>sbn@smxblaw.com</b>  <b>Represents: Florida Retail Federation</b></p>
<p><b>EVgo Services, LLC (25)</b>          Katelyn Lee/Lindsey Stegall          1661 E. Franklin Ave.          El Segundo CA 90245          (213) 500-9092          Katelyn.Lee@evgo.com          Lindsey.Stegall@evgo.com  <b>Represented By:</b> Keyes Law Firm</p>	<p><b>Environmental Confederation of Southwest Florida (25)</b>          421 Verna Road          Sarasota FL 34230  <b>Represented By:</b> Earthjustice</p>
<p><b>Electrify America, LLC (25)</b>          Stephen Bright/Jigar J. Shah          1950 Opportunity Way, Suite 1500          Reston VA 20190          (781) 206-7979          Steve.Bright@electrifyamerica.com          Jigar.Shah@electrifyamerica.com  <b>Represented By:</b> Duane Morris Law Firm</p>	<p><b>Duane Morris Law Firm (25)</b>          Robert E. Montejo          201 S. Biscayne Boulevard, Suite 3400          Miami FL 33131-4325  <b>Represents:</b> Electrify America, LLC</p>

<p><b>Earthjustice (25 Miami)</b> Danielle McManamon 4500 Biscayne Blvd. Ste. 201 Miami FL 33137 (786) 224-7031 dmcmanamon@earthjustice.org flcaseupdates@earthjustice.org <b>Represents:</b> League of United Latin American Citizens of Florida/Environmental Confederation of Southwest Florida/Florida Rising, Inc.</p>	<p><b>Earthjustice (25 Tall)</b> Bradley Marshall/Jordan Luebke 111 S. Martin Luther King Jr. Blvd. Tallahassee FL 32301 (850) 681-0031 (850) 681-0020 bmarshall@earthjustice.org jluebke@earthjustice.org flcaseupdates@earthjustice.org <b>Represents:</b> Florida Rising, Inc./League of United Latin American Citizens of Florida/Environmental Confederation of Southwest Florida, Inc.</p>
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This 9<sup>th</sup> day of June, 2025.

/s/ Floyd R. Self  
Floyd R. Self