

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost
recovery clause and generating
performance incentive factor.

Docket No: 20250001-EI
Filed: September 11, 2025

**THE SOUTHERN ALLIANCE FOR CLEAN ENERGY'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE ITS INTERVENOR TESTIMONY**

The Southern Alliance for Clean Energy (SACE), by and through its undersigned attorney, pursuant to Rule 28-106.204, Florida Administrative Code, hereby requests a 4-day extension of time in which to file its intervenor testimony in the above captioned Docket, and to give affected utilities a commensurate extension to file rebuttal testimony if needed, and in support thereof states as follows:

1. By Order No. PSC-2025-0052-PCO-EI, issued February 10, 2025, Order Establishing Procedure (OEP), the pre-hearing officer established September 12, 2025, as the date by which intervenor's must file their pre-filed testimony and exhibits, if any, with Commission staff testimony and exhibits due September 17, 2025, and the utilities' rebuttal testimony due September 26, 2025.
2. On August 12, 2025, SACE filed its petition to intervene in this proceeding but did not receive confirmation of its party status until more than three weeks later upon the issuance of Order No. PSC-2025-0327-PCO-EI granting intervention for SACE, truncating the time available to SACE and its experts to prepare testimony and exhibits.
3. SACE represents that the testimony it files in this proceeding will provide forward looking recommendations regarding resource diversification, and the benefits of fuel and portfolio diversity in lowering overall fuel costs and risk to customers from

fuel price volatility, particularly from gas prices. The testimony will not address its recommendations to disallowance of costs and will be addressed to the filings of Duke Energy Florida (DEF) and Florida Power and Light Company (FPL). SACE has conferred with the counsel of all parties and is authorized to represent that DEF, FPL and TECO do not object to the extension of time if they are allowed a commensurate extension of time to file any rebuttal testimony that may be needed. Florida Public Utilities Company, the Office of Public Counsel, PCS Phosphate – White Springs, and Nucor Steel Florida, Inc., each indicate that they take no position on the motion. Commission staff has indicated that it takes no position on the motion at this time.

4. Because the motion is unopposed, and the motion seeks commensurate time for utility rebuttal, it will not materially prejudice any party if granted.

WHEREFORE, SACE respectfully requests that the Commission grant its Unopposed Motion for Extension of Time to File Its Intervenor Testimony, and grant SACE an extension of four (4) days in which to file its intervenor testimony and exhibits, with a commensurate extension of time for the utilities to file any rebuttal testimony that may be needed.

Respectfully Submitted,

/s/ William C. Garner

William C. Garner, FL Bar No. 577189
bgarner@wcglawoffice.com
Law Office of William C. Garner, PLLC
3425 Bannerman Road
Unit 105, No. 414
Tallahassee, FL 32312
Telephone (850) 329-5478
Mobile (850) 320-1701
Fax (850) 792-6011

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on this 11th day of September, 2025 via electronic mail on:

Ryan Sandy
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
rsandy@psc.state.fl.us

Kenneth A. Hoffman
Florida Power and Light Company
134 W. Jefferson Street
Tallahassee, FL 32301
ken.hoffman@fpl.com

Maria Moncada, David Lee
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408-0420
maria.moncada@fpl.com
david.lee@fpl.com

Jon C. Moyle, Jr.
c/o Moyle Law Firm
118 North Gadsden Street
Tallahassee FL 32301
(850) 681-3828
(850) 681-8788
jmoyle@moylelaw.com

Mike Cassel
Florida Public Utilities Company
208 Wildlight Avenue
Yulee, FL 32097
mcassel@lpuc.com

Walt Trierweiler, Patty Christensen,
Charles Rehwinkel, Mary Wessling, Octavio
Ponce, Austin Watrous
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
trierweiler.walt@leg.state.fl.us
christensen.patty@leg.state.fl.us
Rehwinkel.charles@leg.state.fl.us
Wessling.mary@leg.state.fl.us
Ponce.octavio@leg.state.fl.us
Watrous.austin@leg.state.fl.us

J. Wahlen, M. Means, V. Ponder
Ausley McMullen
Tampa Electric Company
P.O. Box 391
Tallahassee, FL 32302
jwahlen@ausley.com
mmeans@ausley.com
vponder@ausley.com

Matthew R. Bernier, Robert Pickels,
Stephanie A. Cuello
106 E. College Avenue, Suite 800
Tallahassee FL 32301
matthew.bernier@duke-energy.com
stephanie.cuello@duke-energy.com
Robert.Pickels@duke-energy.com
FLRegulatoryLegal@duke-energy.com

Ms. Paula K. Brown
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601
regdept@tecoenergy.com

Michelle D. Napier, Jowi Baugh
Florida Public Utilities Company
1635 Meathe Drive
West Palm Beach, FL 33411
mnapier@fpuc.com
jbaugh@chpk.com

Beth Keating
Gunster, Yoakley & Stewart, P.A.
Florida Public Utilities Company
215 South Monroe Street, Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

P. J. Mattheis/M. K. Lavanga/J. R. Briscar
Stone Mattheis Xenopoulos & Brew, PC
NUCOR
1025 Thomas Jefferson St. NW
Suite 800 West
Washington DC 20007
(202) 342-0800
(202) 342-0807
jrb@smxblaw.com
mkl@smxblaw.com
pjm@smxblaw.com

James W. Brew, Laura Wynn Baker,
Sarah B. Newman
c/o Stone Law Firm
PCS Phosphate-White Springs
1025 Thomas Jefferson Street NW
Suite 800 West
Washington DC 20007
jbrew@smxblaw.com
lwb@smxblaw.com
sbn@smxblaw.com

/s/ William C. Garner
Attorney