

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20210015-EI
Filed: June 22, 2021

**UNOPPOSED MOTION BY FLORIDA
POWER & LIGHT COMPANY FOR TWO-DAY EXTENSION
OF DEADLINES FOR REBUTTAL TESTIMONY AND DISCOVERY**

Florida Power & Light Company (“FPL”) hereby files this unopposed motion for a two-day extension of the deadlines set forth in Order No. PSC-2021-0116-PCO-EI for the filing of rebuttal testimony and completion of discovery. In support, FPL states:

1. On March 12, 2021, FPL filed a Petition for Base Rate Increase and Rate Unification.
2. The Florida Public Service Commission (“Commission”) issued an Order Establishing Procedure, Order No. PSC-2021-0116-PCO-EI on March 24, 2021; a First Order Revising Order Establishing Procedure, Order No. PSC-2021-0120-PCO-EI on April 1, 2021; and an Amendatory Order, Order No. PSC-2021-0120A on April 8, 2021 (collectively, these 3 orders comprise the “OEP”). The OEP established, among other things, the following deadlines pertinent to this Motion:

Intervenors’ testimony and exhibits	June 21, 2021
Staff’s testimony and exhibits	July 6, 2021
Rebuttal testimony and exhibits	July 12, 2021
Discovery actions completed	August 6, 2021

3. On June 21, 2021 – 101 days after FPL filed its petition and testimony – nine intervenors filed their testimony and exhibits. Altogether, FPL must respond to 20 witness testimonies and exhibits totaling more than 1,900 pages.¹

4. The current OEP provides FPL 21 days to respond to the 20 intervenor testimonies.

5. FPL respectfully requests a two-day extension to file its rebuttal testimony in order to have a reasonable opportunity to review the intervenor testimony and develop thoughtful and thorough responsive testimony in this important matter. With a two-day extension, FPL’s rebuttal testimony would be due to be filed and served by July 14, 2021.

6. If the Commission grants FPL an extension to file rebuttal testimony, it is reasonable and appropriate to extend the deadline to complete discovery also by two days, through and including August 9, 2021, so that all parties keep the same amount of time for discovery that is provided under the current OEP. By adjusting the discovery deadline, no party will be prejudiced.

7. FPL has conferred with counsel for the Office of Public Counsel, Florida Retail Federation, Florida Industrial Power Users Group, Vote Solar, The CLEO Institute, Federal Executive Agencies, Southern Alliance for Clean Energy, Florida Rising, Inc., League of United Latin American Citizens of Florida, Environmental Confederation of Southwest Florida, Inc., Floridians Against Increased Rates, Inc. and Mr. & Mrs. Daniel

¹ The 20 witness testimonies do not include several witnesses who submitted testimony limited to standing issues.

R. Larson, all of whom have advised that they have no objection to the extension request. As of the time of filing this Motion, FPL has not received a response from Walmart.

WHEREFORE, for the reasons described above, FPL respectfully requests a two-day extension, through and including July 14, 2021, to file its rebuttal testimony; and a two-day extension, through and including August 9, 2021, for all parties to complete discovery in this proceeding.

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: /s/ Maria Jose Moncada

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 22nd day of June 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

Office of Public Counsel
Richard Gentry
Patricia A. Christensen
Anastacia Pirrello
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
pirrello.anastacia@leg.state.fl.us
**Attorneys for the Citizens
of the State of Florida**

James W. Brew
Laura Wynn Baker
Joseph R. Briscar
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St, NW
Suite 800 West
Washington, D.C. 20007
jbrew@smxblaw.com
lwb@smxblaw.com
jrb@smxblaw.com
Attorneys for Florida Retail Federation

Jon C. Moyle, Jr.
Karen A. Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com
mqualls@moylelaw.com
**Attorneys for Florida Industrial Power Users
Group**

Barry A. Naum
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
bnaum@spilmanlaw.com
Attorney for Walmart

Stephanie U. Eaton
SPILMAN THOMAS & BATTLE, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
seaton@spilmanlaw.com
Attorney for Walmart

George Cavros
Southern Alliance for Clean Energy
120 E. Oakland Park Blvd., Suite 105
Fort Lauderdale, Florida 33334
george@cavros-law.com
Attorney for Southern Alliance for Clean Energy

Katie Chiles Ottenweller
Southeast Director
Vote Solar
838 Barton Woods Road
Atlanta, GA 30307
katie@votesolar.org
Attorney for Vote Solar

Thomas A. Jernigan, GS-13, DAF
AFIMSC/JA
Holly L. Buchanan, Maj, USAF AF/JAOE-
ULFSC
Robert J. Friedman, Capt., USAF
Arnold Braxton, TSgt, USAF
Ebony M. Payton
Scott L. Kirk, Maj, USAF
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
ULFSC.Tyndall@us.af.mil
thomas.jernigan.3@us.af.mil
holly.buchanan.1@us.af.mil
robert.friedman.5@us.af.mil
arnold.braxton@us.af.mil
ebony.payton.ctr@us.af.mil
scott.kirk.2@us.af.mil
Attorneys for Federal Executive Agencies

Nathan A. Skop, Esq.
420 NW 50th Blvd.
Gainesville, FL 32607
n_skop@hotmail.com
Attorney for Mr. & Mrs. Daniel R. Larson

William C. Garner
Law Office of William C. Garner, PLLC
3425 Bannerman Road
Unit 105, #414
Tallahassee, FL 32312
bgarner@wcglawoffice.com
Attorney for The CLEO Institute Inc.

Bradley Marshall
Jordan Luebke
Earthjustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, Florida 32301
bmarshall@earthjustice.org
jluebke@earthjustice.org

Christina I. Reichert
Earthjustice
4500 Biscayne Blvd., Ste. 201
Miami, FL 33137
creichert@earthjustice.org
flcaseupdates@earthjustice.org
Attorneys for Florida Rising, Inc.
League of United Latin American Citizens of Florida
Environmental Confederation of Southwest Florida, Inc.

Robert Scheffel Wright
John T. LaVia, III
Gardner, Bist, Bowden, Dee, LaVia, Wright
& Perry, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com
**Attorneys for Floridians Against Increased
Rates, Inc.**

By: /s/ Maria Jose Moncada
Maria Jose Moncada
Florida Bar No. 0773301