

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Petition for rate increase by Florida
Power & Light Company**

Docket No: 20250011-EI

Filed: August 4, 2025

**FLORIDA ENERGY FOR INNOVATION ASSOCIATION'S
UNOPPOSED MOTION FOR LEAVE TO ALLOW WITNESSES LOOMIS
AND AHMED TO TESTIFY BY VIDEO CONFERENCE AT FINAL HEARING**

Florida Energy for Innovation Association ("FEIA"), pursuant to rule 28-106.204, Florida Administrative Code, respectfully moves the Commission for leave to allow two of its witnesses, Dr. David Loomis and Dr. Mohamed Ahmed, to appear and provide testimony at the Final Hearing by videoconference. In support of this Motion, FEIA states as follows:

1. Pursuant to the Order No. PSC-2025-0075-PCO-EI, the Final Hearing in this matter is set for a two week period in Tallahassee, Florida from August 11, 2025 through August 22, 2025.

2. FEIA is submitting the testimony of four witnesses at the Final Hearing: Dr. David Loomis, Dr. Mohamed Ahmed, Robert Provine, and Dr. Fletcher Mangum. All of those witnesses reside outside the State of Florida.

3. Because of prior longstanding business commitments that cannot be rescheduled, Witnesses Ahmed and Loomis are not able to travel to Tallahassee and provide testimony in person at the Final Hearing during the second week of the hearing, August 18–22, 2025. Specifically, Witness Ahmed is obligated to be out of the country that week, and Witness Loomis is obligated to appear in other proceedings in other states that week.

4. To address the scheduling conflicts confronting its witnesses, FEIA initially proposed to the other parties that Witnesses Loomis and Ahmed be allowed to appear and testify in person on August 14 or 15, 2025. However, Florida Power & Light Company ("FPL") has

expressed concern that inserting FEIA's witnesses into the proceeding on August 14 or 15 would be confusing and disruptive because FPL will not have been able to put on its case-in-chief witnesses by that time. FEIA has worked with all the parties to resolve FPL's concerns and address FEIA's dilemma regarding witness availability during the week of August 18-22. That resolution is described below.

5. Although Witness Ahmed will be out of the country the week of August 18-22, he is able to appear before the Commission by videoconference anytime on Monday, August 18 or anytime on Tuesday, August 19. Likewise, although Witness Loomis is already obligated to appear in proceedings in other states the week of August 18-22, he is able to appear before the Commission by videoconference any time on August 18 or anytime on August 21. The other FEIA witnesses (Messrs. Provine and Mangum) have been able to adjust their schedules and are available to appear in person in Tallahassee and testify before the Commission anytime on August 20 or 21, 2025.

6. The Commission has recognized that Florida law allows it to conduct administrative hearings by full-motion videoconference and other forms of communications media technology ("CMT"), and that "testimony provided through a form of CMT is afforded equal weight to testimony that is provided in-person." *See* Order No. PSC-2022-0277-PCO-GU (citing Fla. Admin. Code R. 28-109.006).

7. Undersigned counsel for FEIA has consulted with counsel for all the other parties and can represent that FPL, FAIR, and Walmart support the motion to allow FEIA Witnesses Loomis and Ahmed to testify by videoconference at the Final Hearing on the dates described above, and all other parties and Commission Staff have no objection to this motion.

WHEREFORE, for the reasons stated above, FEIA respectfully requests that the Commission grant it leave to have two of its witnesses, Mohamed Ahmed and David Loomis, appear and provide testimony at the Final Hearing by videoconference on the dates described herein.

Respectfully submitted this 4th day of August, 2025.

HOLLAND & KNIGHT LLP

/s/ D. Bruce May, Jr.

D. Bruce May, Jr.

Florida Bar No. 354473

bruce.may@hklaw.com

Kevin W. Cox

Florida Bar No. 034020

kevin.cox@hklaw.com

Kathryn Isted

Florida Bar No. 1005163

kathryn.isted@hklaw.com

315 South Calhoun Street, Suite 600

Tallahassee, Florida 32301

Telephone: (850) 224-7000

*Attorneys for Florida Energy for Innovation
Association*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
e-mail this 4th day of August, 2025 the following:

Jennifer Crawford, Shaw Stiller
and Timothy Sparks
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
JCrawfor@psc.state.fl.us
SStiller@psc.state.fl.us
TSparks@psc.state.fl.us
discovery-gcl@psc.state.fl.us

John T. Burnett
Maria Jose Moncada
Christopher T. Wright
William P. Cox
Joel T. Baker
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
John.t.burnett@fpl.com
Maria.moncada@fpl.com
Christopher.wright@fpl.com
Will.p.cox@fpl.com
Joel.baker@fpl.com

Kenneth A. Hoffman
Florida Power & Light Company
134 West Jefferson Street
Tallahassee, FL 32301
Ken.hoffman@fpl.com

Nikhil Vijaykar
Yonatan Moskowitz
Keyes & Fox, LLP
580 California Street, 12th Floor
San Francisco, CA 94104
nvijaykar@keyesfox.com
ymoskowitz@keyesfox.com
EVgo Services, LLC

Walt Trierweiler
Mary A. Wessling
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
wessling.mary@leg.state.fl.us

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

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

Danielle McManamon
Earthjustice
4500 Biscayne Blvd., Ste. 201
Miami, FL 33137
dmcmanamon@earthjustice.org
William C. Garner

Alicia Zaloga
Keyes & Fox, LLP
1155 Kildaire Farm Road, Ste. 202-203
Cary, NC 27511
azaloga@keyesfox.com
EVgo Services, LLC

Katelyn Lee & Lindsey Stegall
EVgo Services, LLC
1661 E. Franklin Avenue
El Segundo, CA 90245
Katelyn.Lee@evgo.com
Lindsey.Stegall@evgo.com

Leslie Newton, Ashley George, Thomas
Jernigan, James Ely, Michael Rivera and
Ebony Payton
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403
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
Federal Executive Agencies

Robert E. Montejo
Duane Morris LLP
201 S. Biscayne Boulevard, Suite 3400
Miami, FL 33131-4325
REMontejo@duanemorris.com
Electrify America, LLC
Armstrong World Industries, Inc.

Stephen Bright
Jigar J. Shah
Electrify America, LLC
1950 Opportunity Way, Suite 1500
Reston, VA 20190
Steve.Bright@electrifyamerica.com
Jigar.shah@electrifyamerica.com

Brian A. Ardire

Law Office of William C. Garner, PLLC
3425 Bannerman Road
Unit 105, No. 414
Tallahassee, FL 32312
bgarner@wcglawoffice.com
Southern Alliance for Clean Energy

Steven W. Lee
Spilman, Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
slee@spilmanlaw.com
Walmart, Inc.

Stephanie U. Eaton
Spilman, Thomas & Battle, PLLC 110
Oakwood Drive, Suite 500
Winston Salem, NC 27103
seaton@spilmanlaw.com
Walmart, Inc.

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

Floyd R. Self, Ruth Vafek
Berger Singerman, LLP
313 N. Monroe Street, Suite 301
Tallahassee, FL 32301
fself@bergersingerman.com
rvafek@bergersingerman.com
Americans for Affordable Clean Energy, Inc.,
Circle K Stores, inc., RaceTrac, Inc. and
Wawa, Inc.

Alexander W. Judd

Armstrong World Industries, Inc.
2500 Columbia Avenue
Lancaster, PA 17603
baardire@armstrongceilings.com

Duane Morris, LLP
100 Pearl Street, 13th Floor
Hartford, CT 06103
ajudd@duanemorris.com
Armstrong World Industries, Inc.

Robert Scheffel Wright, John T. LaVia, III
Gardner, Bist, Bowden, Dee, LaVia, Wright,
Perry & Harper
1300 Thomaswood Drive
Tallahassee, FL 32308
schef@gbwlegal.com
jlavia@gbwlegal.com
Floridians Against Increased Rates, Inc.

By: /s/ D. Bruce May, Jr.