



**Joel T. Baker**  
**Senior Attorney**  
**Florida Power & Light Company**  
**700 Universe Boulevard**  
**Juno Beach, FL 33408-0420**  
**(561) 691-7255**  
**(561) 691-7135 (Facsimile)**  
**Joel.Baker@fpl.com**

September 25, 2025

**-VIA ELECTRONIC FILING-**

Mr. Adam Teitzman  
Division of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**RE: Docket No. 20250002-EG**

Dear Mr. Teitzman:

Attached for electronic filing in the above docket is Florida Power & Light Company's ("FPL") Amended Petition for Approval of Energy Conservation Cost Recovery Factors for the Period January 2026 through December 2026. Pursuant to Order No. PSC-2025-0047-PCO-EG, the accompanying prepared testimony and exhibit of FPL witnesses Lonzelle Siri Noack and Richard L. Hume will be filed under separate cover.

Please feel free to contact me with any questions regarding this filing.

Sincerely,

/s/ Joel T. Baker

Joel T. Baker  
Fla. Bar No. 0108202

JTB  
Enclosure

Florida Power & Light Company

700 Universe Boulevard, Juno Beach, FL 33408

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Energy Conservation Cost Recovery Clause

Docket No. 20250002-EG

Filed: September 25, 2025

**FLORIDA POWER & LIGHT COMPANY’S AMENDED PETITION  
FOR APPROVAL OF ENERGY CONSERVATION COST RECOVERY  
FACTORS FOR THE PERIOD JANUARY 2026 THROUGH DECEMBER 2026**

Pursuant to Section 366.82(2), Florida Statutes, Rule 25-17.015, Florida Administrative Code (“F.A.C.”), and Order Nos. PSC-93-0709-FOF-EG and PSC-98-1084-FOF-PU, Florida Power & Light Company (“FPL” or “the Company”) hereby files this amended petition to request approval from the Florida Public Service Commission (“Commission”) of alternative Energy Conservation Cost Recovery (“ECCR”) Clause factors (hereinafter “Alternative 2026 ECCR Factors”) to be applied to bills issued during the projected period of January 1, 2026 through December 31, 2026 in the event the Commission approves the proposed 2025 Stipulation and Settlement Agreement currently pending in FPL’s 2025 rate case in Docket No. 20250011-EI (the “2025 Rate Case Settlement Agreement”). The Alternative 2026 ECCR Factors are provided on Alternative Schedule C-1, page 4 of Exhibit LSN-3, attached to the supplemental testimony of FPL witnesses Lonzelle Siri Noack and Richard L. Hume, which are incorporated by reference. The grounds for this Petition are as follows:

1. On August 1, 2025, FPL filed a petition for approval of the Company’s conservation cost recovery true-up and the cost recovery factors proposed for use during the period January 2026 through December 2026 in the above-captioned docket. The factors for which FPL requested approval in that petition were those set forth in Schedule C-1, page 4 of Exhibit LSN-2 submitted with the testimony of Lonzelle Siri Noack.

2. On August 20, 2025, FPL and other signatory parties filed a Joint Motion for approval of the 2025 Rate Case Settlement Agreement in Docket No. 20250011-EI as a full and complete resolution of all pending issues.<sup>1</sup>

3. The 2025 Rate Case Settlement Agreement provides a revised cost allocation methodology to be used for all clauses effective January 1, 2026, and requires FPL to reflect this modification in the 2025 clause proceedings by filing revised clause factors for the Commission's approval. Thus, if the 2025 Rate Case Settlement Agreement is approved, this modified allocation of the ECCR costs will need to be reflected in the 2026 ECCR factors. In addition, the 2025 Rate Case Settlement Agreement modifies the amount of the incentive associated with the Commercial Industrial Demand Reduction and Commercial Industrial Load Control programs, which would have a corresponding impact on FPL's ECCR costs and, by extension, its 2026 ECCR factors.

4. Further, the 2025 Rate Case Settlement proposes a mid-point return on equity ("ROE") of 10.95% and new depreciation parameters to be effective January 1, 2026. As a result, if the 2025 Rate Case Settlement Agreement is approved, the revised ROE and depreciation rates will need to be reflected in FPL's calculation of the 2026 ECCR Factors.

5. Each of these modifications are explained in the Supplemental Testimonies and exhibit of FPL witness Hume and Noack submitted herewith.

6. FPL's 2025 Rate Case Settlement is currently pending for Commission disposition in Docket No. 20250011-EI. To ensure that the 2026 ECCR Factors to become effective January 1, 2026, properly reflect the foregoing adjustments in the event the Commission approves the 2025 Rate Case Settlement, FPL is herein submitting projected Alternative 2026 ECCR Factors.

---

<sup>1</sup> The 2025 Rate Case Settlement Agreement is provided as Attachment 1 to Joint Motion for Approval of Settlement Agreement in Docket No. 20250011-EI, available at: <https://www.floridapsc.com/pscfiles/library/filings/2025/08075-2025/08075-2025.pdf>.

7. The Alternative 2026 ECCR Factors for which FPL is requesting approval in this amended petition are those provided on Alternative Schedule C-1, page 4 of Exhibit LSN-3, and reflect the modifications associated with the terms of the proposed 2025 Stipulation and Settlement Agreement. If the Commission approves the 2025 Rate Case Settlement Agreement, the Alternative 2026 ECCR Factors should be approved. In the event the Commission declines to approve the 2025 Rate Case Settlement Agreement in Docket No. 20250011-EI, then the Commission should approve the 2026 ECCR Factors set forth in Exhibit LSN-2 submitted with the testimony of Lonzelle Siri Noack filed on August 1, 2025.

8. As described in the testimonies of witnesses Hume and Noack, FPL calculated the projected Alternative 2026 ECCR Factors using appropriate methodologies, and those calculations are shown in Exhibit LSN-3 attached to the Supplemental Testimony of FPL witness Noack submitted herewith. As reflected in Exhibit LSN-3, FPL projects the total energy conservation amount to be collected during the January 2026 through December 2026 period to be \$177,331,489, which is net of all program revenues and reflects the applicable over-recovery to be refunded during that period. This amount includes projected 2026 program costs of \$185,800,112. Also included is an over-recovery of \$8,468,624, which reflects the combination of the 2024 net final true-up over-recovery of \$3,826,632 (filed with the Commission on May 1, 2025), and the actual/estimated true-up over-recovery including interest for January 2025 through December 2025 of \$4,641,992 (filed with the Commission on August 1, 2025). Total recoverable energy conservation costs, net of program revenues and reflecting the applicable over-recoveries to be refunded during the January 2026 through December 2026 period, are \$177,331,489, and the ECCR Factors included in Exhibit LSN-3 are designed to recover this level of costs and taxes.

9. The updated revenue requirements to be recovered through the projected Alternative 2026 ECCR Factors were allocated to rate classes using the cost allocation methodologies set forth in the 2025 Rate Case Settlement Agreement.

10. FPL submits that the projects and associated costs included in the Alternative 2026 ECCR Factors are appropriately calculated to recover energy conservation program expenses, are consistent with the 2025 Rate Case Settlement Agreement, and are consistent with the Commission's methodology for calculating the recovery factors.

11. For these reasons, as more fully explained in the supplemental testimonies and exhibit of FPL witnesses Hume and Noack, FPL respectfully requests that, in the event the Commission approves the 2025 Rate Case Settlement Agreement pending in Docket No. 20250011-EI, the Commission also approve the projected Alternative 2026 ECCR Factors set forth in Exhibit LSN-3 to be applied to bills for the period of January 1, 2026 through December 31, 2026. In the event the Commission declines to approve the 2025 Rate Case Settlement Agreement in Docket No. 20250011-EI, FPL respectfully requests the Commission approve the 2026 ECCR Factors set forth in Exhibit LSN-2 filed on August 1, 2025.<sup>2</sup>

**WHEREFORE**, FPL respectfully requests the Commission:

(a) Approve the total net final true-up over-recovery amount of \$3,826,632, including interest, for the period January 2024 through December 2024 as set forth in Exhibit LSN-1 attached to the Direct Testimony of FPL witness Noack filed on May 1, 2025;

---

<sup>2</sup> In the event that the Commission's final decision in Docket No. 20250011-EI requires modifications to the 2026 ECCR Factors, such modifications would be reflected in the ordinary course in FPL's actual/estimated true-up filing to be submitted in 2026.

(b) Approve the actual/estimated true-up under-recovery amount of \$8,468,624, including interest, for the period of January 2025 through December 2025 as set forth in Exhibit LSN-2 attached to the Direct Testimony of FPL witness Noack filed on August 1, 2025;

(c) Approve, as appropriate, one of the following alternative 2026 ECCR Factors subject to the Commission's final disposition of the 2025 Rate Case Settlement Agreement pending in Docket No. 20250011-EI:

(i) In the event the Commission approves the 2025 Rate Case Settlement Agreement, approve the following as set forth in Exhibit LSN-3 attached to the Supplemental Testimony of FPL witness Noack filed herewith: (x) the alternative \$185,800,112 of updated revenue requirements associated with the ECCR programs projected to be incurred between January 1, 2026 and December 31, 2026; (y) the alternative total net projected jurisdictional revenue requirement of \$177,331,489 to be recovered through the 2026 ECCR Factors for the period of January 2026 through December 2026; and (z) the projected Alternative 2026 ECCR Factors for application to bills beginning the first billing cycle in January 2026 through the last billing cycle in December 2026, and continuing until modified by subsequent order of this Commission; or

(ii) In the event the Commission declines to approve the 2025 Rate Case Settlement Agreement, approve as set forth in Exhibit LSN-2 attached to the testimony of FPL witness Noack filed August 1, 2025: (x) the total projected jurisdictional revenue requirement of \$174,806,319 for the period of January 2026 through December 2026; (y) the total net projected jurisdictional revenue requirement of \$166,337,695 to be recovered through the 2026 ECCR Factors for the period of January 2026 through

December 2026; and (z) approve the 2026 ECCR Factors for application to bills beginning the first billing cycle in January 2026 through the last billing cycle in December 2026, and continuing until modified by subsequent order of this Commission; and

(d) Authorize Commission Staff to approve administratively, revised tariffs reflecting the 2026 ECCR factors determined to be appropriate in this proceeding and subject to the Commission's final disposition of the 2025 Rate Case Settlement Agreement pending in Docket No. 20250011-EI.

Respectfully submitted,

By: s/Joel T. Baker

Joel T. Baker  
Florida Bar No. 0108202  
Maria Jose Moncada  
Florida Bar No. 0773301  
William P. Cox  
Florida Bar No. 0093531  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
Telephone: (561) 304-5662  
Facsimile: (561) 691-7135  
joel.baker@fpl.com

**CERTIFICATE OF SERVICE**  
**Docket No. 20250002-EG**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was served by electronic mail this 25th day of September 2025 to the following:

Jacob Imig  
Jennifer Augspurger  
Shaw Stiller  
Office of the General Counsel  
**Florida Public Service Commission**  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
Jimig@psc.state.fl.us  
Jaugspur@psc.state.fl.us  
sstiller@psc.state.fl.us  
discovery-gcl@psc.state.fl.us

J. Jeffry Wahlen  
Malcolm N. Means  
Virginia Ponder  
Ausley McMullen  
Post Office Box 391  
Tallahassee, Florida 32302  
jwahlen@ausley.com  
mmeans@ausley.com  
vponder@ausley.com  
**Attorneys for Tampa Electric Company**

Paula K. Brown  
Manager, Regulatory Coordination  
**Tampa Electric Company**  
Post Office Box 111  
Tampa, Florida 33601-0111  
regdept@tecoenergy.com

Michelle D. Napier  
Director, Regulatory Affairs Distribution  
**Florida Public Utilities Company**  
1635 Meathe Drive  
West Palm Beach, Florida 33411  
mnapier@fpuc.com

Matthew R. Bernier  
Stephanie A. Cuello  
Robert L. Pickels  
106 East College Avenue, Suite 800  
Tallahassee, Florida 32301  
matt.bernier@duke-energy.com  
stephanie.cuello@duke-energy.com  
robert.pickels@duke-energy.com  
FLRegulatoryLegal@duke-energy.com  
**Attorneys for Duke Energy Florida, LLC**

Dianne M. Triplett  
299 First Avenue North  
St. Petersburg, Florida 33701  
dianne.triplett@duke-energy.com  
**Duke Energy Florida, LLC**

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe Street, Suite 601  
Tallahassee, Florida 32301-1804  
bkeating@gunster.com  
**Attorneys for Florida Public Utilities Company**

Brian Goff, Manager/Energy Conservation  
Division/Fort Meade/Florida Division of  
Chesapeake Utilities  
208 Wildlight Avenue  
Yulee, Florida 32097  
Bgoff@chps.com  
**Florida Public Utilities Company**



Mary A. Wessling  
Patricia A. Christensen  
Octavio Ponce  
Austin Watrous  
Charles J. Rehwinkel  
Walt Trierweiler  
Office of Public Counsel  
The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, Florida 32399  
wessling.mary@leg.state.fl.us  
christensen.patty@leg.state.fl.us  
ponce.octavio@leg.state.fl.us  
watrous.austin@leg.state.fl.us  
rehwinkel.charles@leg.state.fl.us  
trierweiler.walt@leg.state.fl.us

**Attorneys for the Citizens of the State of Florida**

Jon C. Moyle, Jr.  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
jmoyle@moylelaw.com  
mqualls@moylelaw.com

**Attorneys for Florida Industrial Power Users Group**

James W. Brew  
Laura Wynn Baker  
Sarah B. Newman  
Stone Mattheis Xenopoulos & Brew, P.C.  
1025 Thomas Jefferson Street, NW  
Eighth Floor, West Tower  
Washington, DC 20007  
jbrew@smxblaw.com  
lwb@smxblaw.com  
sbn@smxblaw.com

**Attorneys for White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate -White Springs**

Peter J. Mattheis  
Michael K. Lavanga  
Joseph R. Briscar  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson Street, NW  
Eighth Floor, West Tower  
Washington, DC 20007  
pjm@smxblaw.com  
mkl@smxblaw.com  
jrb@smxblaw.com

**Attorneys for Nucor Steel Florida, Inc.**

By: s/ Joel T. Baker  
Joel T. Baker  
Fla. Bar No. 0108202