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March 30, 2026

**-VIA ELECTRONIC FILING-**

Adam Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 20260020-EI  
**Petition for determination of need for Andytown-Oasis transmission lines project in  
Broward and Miami-Dade Counties, by Florida Power & Light Company.**

Dear Mr. Teitzman:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") in the above-referenced docket is the rebuttal testimony of FPL witness Andrew McLain.

Please feel free to contact me at 561-304-5662 if you have any questions about this transmittal.

Sincerely,

/s/ William P. Cox  
William P. Cox  
Senior Counsel  
Florida Bar No. 0093531

Enclosure

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

Electronic Mail to the following parties of record this 30th day of March 2026:

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**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET NO. 20260020-EI**

**FLORIDA POWER & LIGHT COMPANY**

**REBUTTAL TESTIMONY OF ANDREW MCLAIN**

**Filed: March 30, 2026**

1 **I. INTRODUCTION**

2 **Q. Please state your name, business address, employer and position.**

3 A. My name is Andrew McLain. My business address is 15430 Endeavor Drive, Jupiter,  
4 Florida 33478. I am employed by Florida Power & Light Company (“FPL” or the  
5 “Company”) as Senior Director, Integrated Strategic Planning.

6 **Q. Please describe your duties and responsibilities in that position.**

7 A. Currently, I am the Senior Director of Integrated System Planning and Strategy. In this  
8 role, I oversee our transmission services group and am involved in many regulatory  
9 and strategic aspects of FPL’s transmission organization.

10 **Q. Please describe your educational background and professional experience.**

11 A. I have B.A. degrees in Geology and Environmental Studies from Bucknell University,  
12 a Juris Doctor from Vermont Law School and an M.B.A. from the University of  
13 Virginia’s Darden School of Business. I have spent the last 20 years of my career  
14 focused on the energy industry. I started my career in the federal government, working  
15 for the U.S. Department of Energy and Federal Energy Regulatory Commission  
16 (“FERC”) as an attorney. I then moved to private practice as an attorney at Bracewell,  
17 focusing on energy regulatory issues. I joined FPL in 2024 as a Senior Director of  
18 Transmission Strategy. Before joining FPL, I worked for NorthWestern Energy, where  
19 I focused on regional energy markets and transmission development. I also managed  
20 NorthWestern Energy’s FERC Compliance office for 12 years, where I was responsible  
21 for all aspects of FERC and NERC compliance, reporting directly to NorthWestern  
22 Energy’s Board of Directors.

1 **Q. Have you previously submitted testimony in this proceeding?**

2 A. No.

3 **Q. What is the purpose of your rebuttal testimony in this proceeding?**

4 A. The purpose of my rebuttal testimony is to respond to the direct testimony submitted  
5 on behalf of the Environmental Defense Fund, Inc. (“EDF”) by its witnesses Ted J.  
6 Thomas and David Cranston regarding FERC Orders 1000 and 1920 and FPL’s Petition  
7 for Determination of Need for the Andytown-Oasis Transmission Lines Project (the  
8 “AOP” or “Project”) filed with the Florida Public Service Commission (“FPSC” or  
9 “Commission”).<sup>1</sup>

10 **Q. Did you review the direct testimony of EDF witnesses Thomas and Cranston?**

11 A. Yes, I reviewed the direct testimonies of EDF witnesses Thomas and Cranston and  
12 considered the arguments they raised regarding the alleged relevance of FERC Orders  
13 1000 and 1920 to FPL’s petition for Determination of Need for approval of the AOP  
14 Project.

15 **Q. Please summarize your rebuttal testimony.**

16 A. My rebuttal testimony explains that EDF’s witnesses’ opinions concerning compliance  
17 with FERC’s transmission planning requirements are irrelevant, beyond the  
18 Commission’s jurisdiction, and should be disregarded by the Commission. The  
19 Commission should reject EDF’s efforts to turn this proceeding into a forum to  
20 complain about FERC’s current regional planning process or adjudicate how the

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<sup>1</sup> FPL is submitting the rebuttal testimony of FPL witness McLain out of an abundance of caution to fully rebut the issues raised by EDF witnesses Cranston and Thomas. However, such testimony should not be construed or interpreted to imply that FPL agrees, concedes, or otherwise acquiesces that the EDF witnesses’ testimony and exhibits regarding the current FERC Order 1000 regional planning process and future FERC Order 1920 regional planning process are relevant to the Commission’s need determination under Section 403.537, F.S., pursuant to the Transmission Lines Siting Act (“TLSA”), Section 403.52-403.5365, F.S., or within the Commission’s jurisdiction.

1           forthcoming regional planning reforms pursuant to FERC Order 1920 should be  
2           implemented and applied. It is not appropriate or ripe to adjudicate FPL’s yet-to-be-  
3           filed FERC Order 1920 compliance filing in this Docket before this Commission. EDF  
4           is a national advocacy organization that is attempting to disparage the merits of FPL’s  
5           regional planning practices in order to obfuscate the very real Florida-specific local  
6           area reliability issues detailed in the direct testimony of FPL witness Miguel Yanes.  
7           To the extent EDF is concerned about FPL’s compliance with FERC’s regional  
8           planning requirements, the proper forum for those complaints is FERC. The  
9           Commission should therefore reject the arguments of the EDF witnesses when  
10          considering FPL’s Petition for Need Determination.

11  
12                           **II.    EDF ARGUMENTS REGARDING FERC ORDER 1920**

13   **Q.    The EDF witnesses argue that the Project is inconsistent with federal transmission**  
14   **planning requirements under FERC Order 1920. Is that the issue before the**  
15   **Commission in this docket?**

16   **A.**    No. The issue before the Commission is whether the Project is needed based on the  
17           criteria in the Florida need determination statute, Section 403.537, Florida Statutes, as  
18           required for certification of the Project under the TLSA. This proceeding is not a forum  
19           for adjudicating compliance with FERC’s federal transmission planning rules or the  
20           development of related future planning processes under FERC Order 1920 that do not  
21           yet exist in any operative form and will not go into effect for Florida’s three  
22           FERC-jurisdictional transmission providers, FPL, Duke Energy Florida (“DEF”), and  
23           Tampa Electric Company (“TECO”) until January 1, 2028. Accordingly, the

1 Commission need not await the outcome of the multi-year FERC implementation  
2 proceeding for FERC Order 1920 to determine whether the AOP is needed under  
3 Section 403.537, Florida Statutes, in this proceeding.

4 **Q. Has EDF been an active participant in the FERC Order 1920 proceeding?**

5 A. Yes. EDF has been an active Order-1920 participant at FERC from the start of the  
6 rulemaking proceeding, mainly through joint Public Interest Organization filings at  
7 FERC, a 2024 rehearing/clarification request, and then judicial review in the Fourth  
8 Circuit Court of Appeals challenging parts of the final rule while supporting the rule’s  
9 overall framework.

10 **Q. Do you know the FERC-mandated implementation timeline for FPL and other  
11 Florida transmission providers to comply with FERC Order 1920?**

12 A. Yes. The compliance filing date for the Florida transmission providers has been  
13 extended to June 12, 2026. FPL, together with DEF and TECO, has been working with  
14 the Florida Reliability Coordinating Council (“FRCC”), its members, and stakeholders  
15 to draft amendments to their respective Open Access Transmission Tariffs to comply  
16 with FERC Order 1920 and establish a planning process that is open, transparent, and  
17 designed to identify more efficient or cost-effective long-term regional transmission  
18 solutions as required by FERC Order 1920. After FPL’s FERC compliance filing is  
19 submitted on or before June 12, 2026, the first FRCC planning cycle under FERC Order  
20 1920 would start on January 1, 2028, and would conclude no later than January 1, 2031.  
21 Accordingly, there currently is no FERC-approved Order 1920 transmission planning  
22 process in effect for FPL, and the completion of the first planning cycle under that

1 process is still several years away. Importantly, it is FERC that will review and approve  
2 the future FERC Order 1920 compliance filings.

3 **Q. Do you believe EDF is aware of the implementation timeline for FERC Order**  
4 **1920?**

5 A. Yes. The orders are all available on FERC’s public eLibrary webpage. Given EDF’s  
6 extensive advocacy focused on FERC Order 1920 and participation as a stakeholder in  
7 the FRCC’s Order 1920 filing process, I believe EDF is or should be aware that the  
8 compliance filings for the Florida transmission providers are still being developed and  
9 not due to be filed at FERC until June 12, 2026, and that the first planning cycle under  
10 FERC Order 1920 would start on January 1, 2028, and conclude no later than January  
11 1, 2031.

12 **Q. Is the Commission required to delay a needed transmission project pending future**  
13 **state or federal regional planning reforms and processes?**

14 A. No. For a transmission need determination petition like this one for the AOP, Section  
15 403.537, Florida Statutes, requires that the Commission must determine whether a  
16 proposed transmission facility is needed to ensure reliable service and provide  
17 abundant, low-cost electric energy. Nothing in state or federal law or regulations  
18 requires the Commission to defer action on an identified reliability need while awaiting  
19 changes to future federal planning processes and the development of associated  
20 regional projects. Stated simply, this proceeding is not the forum to make such future  
21 transmission planning process changes.

1 **Q. The EDF witnesses assert that FPL’s and FRCC’s processes “fail to comply with”**  
2 **FERC Order 1920. Is that accurate?**

3 A. No. Again, FERC’s Order 1920 establishes a prospective regulatory framework that  
4 must first be implemented through compliance filings and FERC approval before any  
5 substantive planning obligations attach. The rule expressly requires each transmission  
6 provider to submit a compliance filing revising its tariff to implement Long-Term  
7 Regional Transmission Planning and related requirements. Only *after* those filings  
8 are accepted does the new planning regime begin to govern utility conduct. In the  
9 case of Florida, the first planning cycle under FERC Order 1920 would start on  
10 January 1, 2028, and conclude no later than January 1, 2031. Thus, as of the date of  
11 the EDF witnesses’ testimony (March 24, 2026), FERC has not yet received or  
12 reviewed FPL’s proposed FERC Order 1920 tariff amendments.

13 **Q. EDF witness Thomas argues that approving the AOP Project would “circumvent”**  
14 **FERC Order 1920. Is that accurate?**

15 A. No. The witness’s argument rests on a fundamental chronological error – it assumes  
16 that binding FERC Order 1920 obligations are already operative today. However, as  
17 explained above, those obligations have not yet taken effect for Florida transmission  
18 providers, and the FERC Order 1920 planning processes the EDF witnesses attempt to  
19 invoke do not yet exist in any operative form. FERC Order 1920 does not prohibit  
20 utilities from addressing current, enforceable reliability needs in the interim, nor does  
21 it require deferral of necessary projects pending future regional studies. Nothing in  
22 FERC Order 1920 suspends a utility’s obligation to comply with mandatory NERC

1 reliability standards today or otherwise delay projects that are necessary to ensure  
2 reliable electric service for customers.

3 **Q. EDF witness Thomas asserts that approval of the AOP Project would “artificially**  
4 **foreclose” future benefits of regional planning and “reduc[e] FPL’s obligations**  
5 **under FERC Order 1920 to a mere paper exercise.” Do you agree?**

6 A. No. The structure of FERC Order 1920 itself undercuts the notion of “preemptive  
7 foreclosure.” The rule recognizes that transmission planning is an iterative, ongoing  
8 process and does not prohibit or invalidate local or near-term projects developed  
9 outside the long-term planning cycle. Instead, it supplements existing planning  
10 processes by requiring transmission providers to incorporate long-term, regional  
11 considerations going forward. In other words, FERC Order 1920 does not freeze the  
12 grid pending future planning cycles; it overlays a new framework that operates  
13 prospectively alongside existing planning practices. Accordingly, the Project does not  
14 foreclose or prejudice any future regional transmission development.

15 **Q. Do you have any closing remarks in rebuttal to the EDF witnesses regarding FPL**  
16 **compliance with FERC Order 1920?**

17 A. Yes. There is no merit to EDF’s witnesses’ testimony because their comments are  
18 neither ripe nor placed in the correct forum. On the one hand, they are insinuating that  
19 FPL’s planning process is somehow flawed because it fails to use federal tariff  
20 amendments for FERC Order 1920 that have yet to be filed or approved by FERC, and,  
21 on the other hand, they are ignoring that future Order 1920 outcomes are not a  
22 prerequisite to acting here. If EDF has concerns about FPL’s yet-to-be-filed FERC  
23 Order 1920 compliance filing, it can lodge those comments for FERC consideration at

1 an appropriate future time – not force their narrative from the national level into state  
2 commission proceedings.

3

4

### III. CONCLUSION

5 **Q. What is your overall conclusion regarding the EDF testimony as it relates to the**  
6 **application of FERC Order 1920 to the AOP Project?**

7 A. The testimony of EDF witnesses Thomas and Cranston is attempting to conflate a state  
8 jurisdictional need determination with a federal policy issue on a yet-to-be-  
9 implemented FERC order. Likewise, their testimony does not respect the proper  
10 relationship between FERC Order 1920 and the local transmission need for the AOP  
11 as further explained by FPL witness Yanes in his rebuttal testimony. FERC Order 1920  
12 neither limits FPL’s ability to propose, construct, and operate the Project as a local  
13 transmission project nor does it limit the Commission’s authority to approve the Project  
14 under the Florida need determination statute, Section 403.537, Florida Statutes, as  
15 required for certification of the Project under the TLSA. Any arguments concerning  
16 FERC Order 1920 are clearly premature in any event. EDF will have a time and  
17 opportunity to provide input and contest FERC Order 1920 implementation at FERC.  
18 But that time and place is not here and now before this Commission.

19 **Q. Does this conclude your rebuttal testimony?**

20 A. Yes.