

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination of Need for Andytown-Oasis Transmission Lines Project in Broward and Miami-Dade Counties, by Florida Power & Light Company	DOCKET NO. 20260020-EI DATED: MARCH 31, 2026
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**THE ENVIRONMENTAL DEFENSE FUND'S
MOTION TO ALTER SCHEDULE**

The Environmental Defense Fund, Inc. (“EDF”), pursuant to Chapter 120, Florida Statutes,¹ Section 403.537(3), Florida Statutes, and Rule 28-106.204, Florida Administrative Code (“F.A.C.”), hereby moves the Commission to alter the schedule set forth in Commission Order No. 2026-0056-PCO-EI, the Order Establishing Procedure (“OEP”) for this proceeding to allow sufficient time for additional information regarding available alternatives to FPL’s proposed Andytown-Oasis Project transmission lines (the “Andytown Project”) to be prepared and provided to the Commission. As explained below, the time schedule established by the OEP is insufficient to allow parties other than FPL to prepare and present adequate evidence as required by Section 120.57(1), F.A.C., and norms of due process. EDF respectfully asks the Commission to alter the time schedule as prayed herein to assure that the Commission has adequate information upon which to make its decisions in this case. The insufficiency of time allowed by the OEP constitutes good cause for granting EDF’s Motion.

In further support of its Motion to Alter Schedule, EDF states as follows.

1. EDF moved to intervene in this proceeding on March 23, 2026, and no party has objected to EDF’s intervention. (FPL has reserved its rights to require EDF to establish its standing through proof or stipulations.)

¹ All references herein to the Florida Statutes are to the 2025 edition thereof.

2. The substantive portion of this proceeding was initiated by FPL's filing its petition and the testimony and exhibits of Miguel A. Yanes on March 11, 2026. The OEP was issued on March 12, 2026. As relevant to EDF's Motion, the OEP required intervenor testimony to be filed on March 24, 2026, thirteen days after parties saw FPL's petition, testimony, and exhibits for the first time.

3. FPL's proposed Andytown Project has an estimated construction cost of approximately \$782 million.

4. In the thirteen days available, EDF prepared and submitted the testimony of two witnesses, Ted J. Thomas and David Cranston. These witnesses' testimonies state that FPL has not provided sufficient information regarding available alternatives, including without limitation, regional transmission projects, Advanced Transmission Technologies ("ATTs"), Grid Enhancing Technologies ("GETs"), battery storage projects, and other non-wires alternatives to the Andytown Project to enable a full evaluation of whether the Andytown Project is, in fact, needed to satisfy the criteria in the Transmission Line Siting Act. In the course of preparing and filing EDF's testimony, EDF has also concluded that FPL's analyses are insufficient to establish that the Andytown Project satisfies standards of prudent utility practice because of its overall failure to consider available alternatives.

5. Accordingly, EDF hereby requests that the Commission alter the time schedule (the time limitations, in the terms of Section 403.537, F.S.) for this proceeding to either (a) require FPL to conduct and submit additional analyses of available

alternatives to the Andytown Project, or (b) allow EDF sufficient time to engage appropriate engineering experts to evaluate available alternatives and to prepare and submit their expert testimony.

6. EDF suggests that, given FPL's resources and its extensive knowledge of transmission technologies, transmission conditions in South Florida, and the Andytown Project, the preferable and more efficient course of action is for FPL to prepare and present the additional analyses. EDF stands ready, willing, and able to cooperate with FPL in such effort. EDF suggests that, while it obviously cannot speak for FPL, a period of 60 to 90 days would likely be sufficient for FPL to accomplish this. If, on the other hand, FPL declines this opportunity, EDF suggests that a period of six (6) months would be sufficient for EDF to engage experts to evaluate alternatives and to prepare and submit testimony and exhibits based on their analyses.

7. Statement of Conferral. Pursuant to Rule 28-106.204(3), F.A.C., counsel for EDF conferred with the other parties in this case regarding this Motion to Alter Schedule. EDF can represent that FPL opposes the Motion, that the Office of Public Counsel supports the Motion as being in the public interest, that the Commission Staff take no position on the Motion at this time, and that the South Florida Regional Planning Council has not had sufficient time to respond to EDF's conferral request.

CONCLUSION AND PRAYER FOR RELIEF

WHEREFORE, the Environmental Defense Fund, Inc., respectfully moves the Commission to enter its order granting this Motion to Alter Schedule and either to require that FPL prepare and submit additional analyses of available alternatives to the Andytown

Project within a reasonable time, or requiring that EDF prepare and submit such additional analyses as are identified and recommended by EDF's yet-to-be-engaged experts within a reasonable time of not less than six months

Respectfully submitted this 31st day of March, 2026.

/s/Robert Scheffel Wright

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CERTIFICATE OF SERVICE

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

by electronic mail on this 31st day of March, 2026, to the following:

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