

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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**PREHEARING STATEMENT OF
THE ENVIRONMENTAL DEFENSE FUND, INC.**

The Environmental Defense Fund, Inc. (“EDF”) pursuant to the Order Establishing Procedure in this Docket, Order No. PSC-2026-0056-PCO-EI, issued March 12, 2026, hereby submits its Prehearing Statement.

APPEARANCES:

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On behalf of The Environmental Defense Fund, Inc.

1. **WITNESSES:**

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
David Cranston	Appropriate principles for utilities and regulatory commissions applicable to planning and investment decisions for transmission and related power supply projects; consistency of the Andytown Project with federal policies and requirements; alternatives to the Andytown Project that should be considered.	ALL

Ted Thomas	Appropriate principles for utilities and regulatory commissions applicable to planning and investment decisions for transmission and related power supply projects; consistency of the Andytown Project with federal policies and requirements; alternatives to the Andytown Project that should be considered; inadequate time allowed for parties to address the Andytown Project; FPL's transmission planning for the Andytown Project fails to serve the public interest.	ALL
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EDF also reserves its right to cross-examine all witnesses and to rely upon the prefiled testimony of witnesses in this docket, as well as their testimony given on cross-examination.

2. EXHIBITS:

EDF will introduce the following exhibits sponsored by its witnesses. EDF further reserves its right to introduce exhibits through cross-examination of other parties' witnesses.

<u>Witness</u>	<u>Proffered by</u>	<u>Exhibit No.</u>	<u>Description</u>	<u>Issues</u>
Cranston	EDF	DC-1	Resume of David Cranston	
	EDF	DC-2	Assessment of Florida's Electric Transmission System Performance and Opportunities for Enhancement (2026)	ALL
	EDF	DC-3	FERC Order No. 1000	ALL
	EDF	DC-4	FERC Order No. 1920	ALL
	EDF	DC-5	FERC Order No. 1920-A	ALL
	EDF	DC-6	FERC Order No. 1920-B	ALL
	EDF	DC-7	EDF Comments to FRCC Order 1920 Tariff Language (Project Selection)	ALL

	EDF	DC-8	EDF Comments to FRCC Order 1920 Tariff Language (Needs Analysis)	ALL
	EDF	DC-9	EQ Research EDF Florida Fuel Cost Report	ALL
	EDF	DC-10	Rao Konidena Testimony in Indiana Ameren CPCN Case	ALL
	EDF	DC-11	The Untapped Grid (March 2026)	ALL
	EDF	DC-12	Unlocking the Queue with GETs (February 2021)	ALL
Thomas	EDF	TT-1	Resume of Ted Thomas	
	EDF	TT-2	FERC Order No. 1000	ALL
	EDF	TT-3	FERC Order No. 1920	ALL
	EDF	TT-4	FERC Order No. 1920-A	ALL
	EDF	TT-5	FERC Order No. 1920-B	ALL
	EDF	TT-6	2025 Transmission Planning and Development Report Card (Feb. 2026)	ALL
	EDF	TT-7	DOE National Transmission Needs Study (Oct. 2023)	ALL
	EDF	TT-8	National Transmission Planning Study – Chapter 1	ALL
	EDF	TT-9	National Transmission Planning Study – Chapter 2	ALL
	EDF	TT-10	National Transmission Planning Study – Chapter 3	ALL
	EDF	TT-11	National Transmission Planning Study – Chapter 4	ALL
	EDF	TT-12	National Transmission Planning Study – Chapter 5	ALL
	EDF	TT-13	National Transmission Planning Study – Chapter 6	ALL
	EDF	TT-14	National Transmission Planning Study – Executive Summary	ALL
	EDF	TT-15	Delaying Transmission Increases Cost and Reduces Benefits for Consumers (2025)	ALL

3. STATEMENT OF BASIC POSITION:

The Andytown-Oasis Transmission Lines Project (“AOP”), and the four transmission lines that FPL has proposed in its petition, do not comply with the statutory requirement that the project “take into account the need for electric system reliability and integrity, the need for abundant, low-cost electrical energy to assure the economic well-being of the residents of this state . . . and other matters within its jurisdiction deemed relevant to the determination of need.”¹

FPL has overstated load growth in Miami-Dade County, which indicates that the lines are not needed by 2033. In addition, FPL has only considered reliability needs on its transmission system, while failing to consider un-economic dispatch on the system that a well-planned transmission solution could also address. Furthermore, while FPL has described certain alternatives that it rejected in favor of the AOP, these alternatives only considered alternate routing to the AOP but were not fundamentally different projects. The alternatives still involved building four new transmission lines of the same voltages and in the same general geographic footprint (Miami-Dade County and Broward County) as the AOP. FPL did not consider different *types* of transmission solutions that either do not require constructing new lines or that span a different geography. Because the AOP only includes new transmission infrastructure in the South Florida load pocket, FPL has also chosen a solution that insufficiently considers the well-known power import need of Miami-Dade County and Broward County (a need that FPL management has previously

¹ Florida Statutes 403.537

acknowledged), given the lack of existing and planned local generation to meet local demand.

Significantly, FPL has failed to evaluate alternatives to the AOP that would satisfy all applicable reliability criteria *and* better meet the needs of Florida residents and businesses for abundant, low-cost electrical energy to assure the economic well-being of Florida residents and the Florida economy as a whole. For example, FPL did not consider Advanced Transmission Technologies, Grid-Enhancing Technologies, or non-wires alternatives such as Dynamic Line Rating, Advanced Power Flow Controllers, reconductoring using Advanced Conductors, Topology Optimization, or Battery Energy Storage Systems that can be deployed at less cost than the construction of new transmission lines while meeting the same reliability needs.

Finally, FPL has failed to consider regional alternatives to the proposed project. Such alternatives include not only building new regional transmission lines, but expanding the capacity of existing regional lines or applying ATTs, GETs, and non-wires solutions to existing regional transmission infrastructure. FPL has repeatedly failed to conduct true regional transmission planning as required by applicable orders of the Federal Energy Regulatory Commission and principles of prudent utility practice. Thorough regional planning would have identified cost-effective transmission solutions for the betterment of all Floridians – not only FPL’s ratepayers. It would have resulted in significant cost-savings for ratepayers across the state, and a more reliable grid. Through its participation in the regional planning process, FPL has access to the information that would support consideration of regional needs, yet it did not consider any such needs or

options. By artificially narrowing its transmission planning scope to evaluate only localized 'new steel' solutions, FPL has willfully blinded itself—and the Commission—to regional alternatives that could provide ratepayers with access to abundant, low-cost electrical energy at substantially lower cost than its reliance on localized new-construction projects like the AOP. The Commission has an independent statutory duty to protect captive ratepayers from imprudent capital investments. Because FPL failed to evaluate the full spectrum of cost-effective regional alternatives, its Petition is legally insufficient and must be rejected.

4. STATEMENT OF FACTUAL ISSUES AND POSITIONS:

Please see EDF's Legal Issues EDF-1 through EDF-4 and EDF's Issues of Fact and Policy EDF-5 through EDF-10 that are included following ISSUE 4 within this section (before ISSUE 5 regarding closing the docket).

ISSUE 1: When taking into account the need for electric system reliability and integrity, as prescribed in Section 403.537, Florida Statutes, is there a need for Florida Power & Light Company's proposed:

- (A) 500-kV transmission line starting at FPL's existing Andytown substation and ending at FPL's planned Oasis substation?
- (B) 500-kV transmission line starting at FPL's existing Quarry substation and ending at FPL's planned Oasis substation?
- (C) 230-kV transmission line starting at FPL's planned Oasis substation and ending at FPL's existing Quarry substation?
- (D) 230-kV transmission line starting at FPL's planned Oasis substation and ending at FPL's existing Levee substation?

EDF: FPL has not demonstrated that all four transmission lines that comprise the Andytown Project are needed for electric system reliability because FPL has not considered other available measures that would satisfy FPL's reliability need consistent with prudent utility practice and with applicable FERC rules,

specifically including FERC Order No. 1000. Further, FPL's claimed need appears to be based on overstated load growth in the Miami-Dade County area of its service area.

ISSUE 2: When taking into account the need for abundant, low-cost electrical energy to assure the economic well-being of the citizens of the State, as prescribed in Section 403.537, Florida Statutes, is there a need for Florida Power and Light Company's proposed:

- (A) 500-kV transmission line starting at FPL's existing Andytown substation and ending at FPL's planned Oasis substation?
- (B) 500-kV transmission line starting at FPL's existing Quarry substation and ending at FPL's planned Oasis substation?
- (C) 230-kV transmission line starting at FPL's planned Oasis substation and ending at FPL's existing Quarry substation?
- (D) 230-kV transmission line starting at FPL's planned Oasis substation and ending at FPL's existing Levee substation?

EDF: FPL has not demonstrated that the four transmission lines that comprise the Andytown Project are needed to assure the provision of abundant, low-cost electrical energy to assure the economic well-being of the residents of Florida, because FPL has not considered other available measures that would satisfy FPL's claimed reliability need consistent with prudent utility practice and with applicable FERC rules, specifically including FERC Order No. 1000. Further, FPL's claimed need appears to be based on overstated load growth in the Miami-Dade County area of its service area. Finally, EDF believes that more cost-effective alternatives are available than the four lines comprising the Andytown Project, which would provide power at a lower cost, consistent with the statutory criterion.

ISSUE 3: Are Florida Power & Light Company's proposed starting and ending points appropriate for the:

- (A) 500-kV transmission line to start at existing Andytown substation in Broward County and end at planned Oasis substation in Miami-Dade County?
- (B) 500-kV transmission line to start at existing Quarry substation in Miami-Dade County and end at planned Oasis substation in Miami-Dade County?

- (C) 230-kV transmission line to start at planned Oasis substation in Miami-Dade County and end at existing Quarry substation in Miami-Dade County?
- (D) 230-kv transmission line to start at planned Oasis substation in Miami-Dade County and end at existing Levee substation in Miami-Dade County?

EDF: As explained in EDF’s positions on Issue 1 and Issue 2 above, FPL has not demonstrated that the four transmission lines that comprise the Andytown Project are needed to ensure FPL’s system reliability or to assure the provision of abundant, low-cost electrical energy to assure the economic well-being of the residents of Florida, because FPL has not considered other available measures that would satisfy FPL’s claimed reliability need. Accordingly, EDF believes that the starting and ending points of the proposed lines comprising the Andytown Project are not appropriate.

ISSUE 4: Should the Commission grant Florida Power & Light Company’s petition for determination of need for the proposed:

- (A) 500-kV Andytown-Oasis transmission line project?
- (B) 500-kV Quarry-Oasis transmission line project?
- (C) 230-kV Oasis-Quarry transmission line project?
- (D) 230-kv Oasis-Levee transmission line project?

EDF: No.

EDF’S PROPOSED ISSUES

LEGAL ISSUES

EDF-1: Is FPL required to comply with the requirements of FERC Order No. 1000 in planning for the Andytown Project?

EDF: Yes.

EDF-2: Is FPL required to consider Orders Nos. 1920, 1920-A, and 1920-B in the planning and implementation of the Andytown Project?

EDF: FERC Orders Nos. 1920, 1920-A, and 1920-B established an additional transmission planning process that FPL must engage in, building on Order No. 1000, and which takes into account local transmission project development. While FRCC is still finalizing its compliance filing, and while the first Order No. 1920 planning process would not start until 2028, utilities must nevertheless engage in planning processes that would not make Order No. 1920 impractical, or irrelevant. Prudent utility planning requires factoring in known, federally mandated regulatory shifts. Order 1920 is not a hypothetical concept; it remains a final, binding federal rule that will drastically alter how transmission costs and benefits are allocated. As a result, FPL must consider the purpose and legal requirements of Order No. 1920 into all local transmission planning processes.

EDF-3: Is the Commission authorized by Section 403.537(1)(c), Florida Statutes, to consider the requirements of FERC Order No. 1000 in making its decisions regarding the Andytown Project?

EDF: Yes. The requirements of the Federal Energy Regulatory Commission's transmission planning rules are clearly within the overall jurisdiction of the Commission.

EDF-4: Is the Commission authorized by Section 403.537(1)(c), Florida Statutes, to consider the anticipated requirements of Orders Nos. 1920, 1920-A, and 1920-B?

EDF: Yes. Federal rules, such as Orders Nos. 1920, 1920-A, and 1920-B can be considered by the Commission within its jurisdiction to determine the prudence of a proposed utility asset. These requirements of the Order are already binding on FPL, and FPL has already worked with the regional grid planner, FRCC, in developing its compliance filing for FERC approval. While FRCC is not expected to begin the long-term regional planning process until 2028, the requirements of Order No. 1920 remain in force on FPL

ISSUES OF FACT & POLICY

EDF-5: Did the planning processes that FPL utilized and employed in planning the facilities that comprise the Andytown-Oasis Transmission Lines Project comply with the requirements of FERC Order No. 1000? If not, what should the Commission do?

EDF: No. FPL's processes and analyses were not part of a regional transmission planning process that produced a regional transmission plan, nor was the project identified through a regional planning process. Rather, FPL's transmission development processes were based on localized considerations and not a fulsome evaluation of regional needs.

The Commission should require FPL to conduct additional analyses of Florida system-wide needs to determine if there are regional alternatives that can meet reliability needs identified by FPL, and serve additional regional needs, to best ensure that the project optimally provides abundant, low-cost electrical energy to assure the economic well-being of the residents of Florida.

EDF-6: Should the Commission consider the planning requirements in FERC Orders 1920, 1920-A, and 1920-B in making its determination of need for the Andytown Project? If so, what specific actions should the Commission take to ensure that the Andytown Project is planned, designed, and implemented to best meet FPL's need for reliable transmission facilities and to best meet the need for abundant, low-cost electrical energy for Florida?

EDF: Yes, the Commission should consider the planning requirements of these FERC Orders. Order No. 1920 was issued because not enough regional planning was being conducted by utilities and their regional grid planners. Instead, many expensive, and potentially unnecessary local projects were being built. The Order requires that regional transmission plans consider any local plans, or planned transmission projects to ensure that transmission projects are appropriately sized; the concern being that local transmission could get built on the side of the process all but making the regional plan meaningless. As a result, where local projects are proposed, the Commission must look to these regional planning requirements to determine if the proposed project is a prudent investment. As a result, the Commission should require FPL to conduct additional analyses of regional alternatives to ensure that whatever facilities are constructed to address the reliability needs identified by FPL are planned, designed, and implemented to optimally provide abundant, low-cost electrical energy to assure the economic well-being of the residents of Florida.

EDF-7: Did the planning processes that FPL utilized and employed in planning the facilities that comprise the Andytown-Oasis Transmission Lines Project comply with Rule 25-22.076, F.A.C., Contents of Petition, that applies to transmission line need determination proceedings?

EDF: No. FPL's planning processes did not comply with applicable provisions of the Commission's Rule 25-22.076, F.A.C., including specifically Rule 25-22.076(4), F.A.C., which requires FPL to consider major alternative transmission improvements that were examined and evaluated in arriving at the decision to pursue the proposed project. It appears that FPL did not consider any such alternative transmission improvements, such as those discussed in the testimonies of Ted Thomas and David Cranston, demonstrating at least a failure by FPL to comply with the intent of this Rule.

Further, Rule 25-22.076(5)(b)&(f), F.A.C., requires a statement as to whether the proposed transmission line or lines will improve intra- or inter-system power transfer capabilities and improve system economics. FPL's petition appears to only address intra-FPL transmission and does not appear to address overall system economics at all.

EDF-8: Did the planning processes that FPL utilized and employed in planning the facilities that comprise the Andytown-Oasis Transmission Lines Project comply with Section 403.52, Florida Statutes, which declares that it is the intent of the Transmission Line Siting Act to fully balance the need for transmission lines with the broad interests of the public in order to effect a reasonable balance between the need for the facility as a means of providing reliable, economical, and efficient electric energy and the impact on the public and the environment?

EDF: No. FPL's planning processes did not comply with the intent of the TLSA because FPL's processes failed to consider overall system economic impacts and broader geographic impacts of the Andytown Project.

EDF-9: Did the planning processes that FPL utilized and employed in planning the facilities that comprise the Andytown-Oasis Transmission Lines Project comply with principles of prudent utility practice?

EDF: No. FPL's planning processes did not comply with prudent utility practice because FPL failed to consider other available measures that would satisfy

FPL's claimed reliability needs and the need for abundant, low-cost electrical energy.

EDF-10: Did the procedures and schedule prescribed by the Commission for this docket provide adequate opportunity for substantially affected persons and parties to present evidence in support of their positions, consistent with Section 120.57(1)(b), Florida Statutes, and norms of due process applicable to agency decisions determining the substantial interests of affected persons and parties? If not, what should the Commission do?

EDF: No. The schedule prescribed by the Commission, which allowed only 13 days from the filing of FPL's petition to the required filing of intervenor testimony, was not adequate to allow parties, including EDF, to provide adequate testimony addressing FPL's proposed Andytown Project. Moreover, since FPL did not adequately consider available alternatives to its proposed Andytown Project, the Commission should either deny FPL's petition or abate the current proceeding to allow FPL to perform additional analyses evaluating available alternatives.

ISSUE 5: Should this docket be closed?

EDF: After any final order entered by the Commission has become final and no longer subject to appeal, this docket should be closed.

5. **STIPULATED ISSUES:**

EDF is not aware of any stipulated issues at this time.

6. **PENDING MOTIONS:**

EDF has a pending Motion to Intervene. EDF has filed a motion to alter the schedule for this proceeding in order to provide the Commission with additional information regarding available alternatives to the Andytown Project.

7. STATEMENT OF PARTY'S PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY:

EDF has no pending requests for confidential classification.

8. OBJECTIONS TO QUALIFICATION OF A WITNESS AS AN EXPERT:

EDF does not intend to object to the qualifications of any witnesses to testify as to the subject matter of their testimony. EDF does, of course, reserve the right to cross-examine any witness on matters relating to the witness's credibility.

9. REQUEST FOR SEQUESTRATION OF WITNESSES:

EDF does not request sequestration of witnesses.

10. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

Other than EDF's objections to the procedural schedule that are addresses by EDF's Motion to Alter Schedule filed on March 31, there are no requirements of the Order Establishing Procedure with which EDF cannot comply.

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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