

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

FILED: April 8, 2026

AMENDED PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel (“OPC”), pursuant to the Florida Public Service Commission (“Commission”) Order Establishing Procedure (“OEP”), Order No. PSC-2026-0056-PCO-EI, issued March 12, 2026, hereby submit this amended prehearing statement.

APPEARANCES:

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Public Counsel

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Deputy Public Counsel

Patricia A. Christensen
Associate Public Counsel

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Attorneys for the Citizens of the State of Florida

1. **WITNESSES:** None.

2. **EXHIBITS:** None.

3. **STATEMENT OF BASIC POSITION:**

On February 9, 2026, FPL's filed its notice of intent to file a petition for transmission lines need determination for Andytown-Oasis transmission line Project ("AOP"). The resulting petition was filed on March 11, 2026. While the FAR notice of the April 7, 2026 Prehearing and April 23, 2026 Hearing was published March 6, 2026, the Order Establishing Procedure with the other key activities dates including Prehearing Statement date was not issued in the above docket until March 11, 2026. OPC intervened on March 20, 2026, and issued discovery on March 23, 2025, and the responses are due March 30, 2026. Rebuttal testimony was due March 30, 2026. In addition, deposition(s) for FPL witness(es) were scheduled for April 3, 2026. Less than 20 days after the filing of the Petition and FPL direct testimony, and without the benefit of time to fully review FPL's responses to OPC's discovery and FPL's rebuttal testimony, as well as pending scheduled depositions, regretfully, OPC must take a "no" position on the issues at this time. In the determination of need, the commission shall 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, the appropriate starting and ending point of the line, and other matters within its jurisdiction deemed relevant to the determination of need. The appropriate starting and ending points of the electric transmission line must be verified by the commission in its determination of need. Given the accelerated 45-day pace from the date of filing of the application or request for hearing pursuant to Section 403.537(1)(a), Florida Statutes, OPC maintains there has been insufficient time to fully evaluate FPL's request. Thus, OPC maintains at this time, FPL has not carried its burden to prove the need, including the cost-effectiveness for each of the proposed transmission projects. OPC reserves its rights to take positions based on discovery and the evidence adduced at hearing.

4. **STATEMENT OF FACTUAL ISSUES AND POSITIONS:**

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?

OPC Position:

No. OPC maintains that FPL has not carried its burden to prove the need for each of the proposed transmission projects.

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 & 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?

OPC Position:

No. 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, on the need for each of these proposed

transmission projects, OPC maintains FPL has not carried its burden to prove the need for each of the proposed transmission projects.

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?

OPC Position:

No. OPC maintains that FPL has not carried its burden to prove the appropriateness of the proposed starting and ending points for each of the proposed transmission projects.

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?

OPC Position:

No. OPC maintains FPL has not carried its burden to prove the need for each of the proposed transmission projects.

ISSUE 5:

Should this docket be closed?

OPC Position:

OPC takes no position.

EDF ISSUES

(1) Is FERC Order No. 1000 relevant to this proceeding and within the Commission's jurisdiction to consider?

OPC Position: Yes, FERC Order No. 1000 is relevant to this proceeding and within the Commission's jurisdiction to consider to the extent under federal law and state law consideration and enforcement of FERC Order No. 1000 has been delegated to the state.

(2) Are FERC Order Nos. 1920, 1920-A, and 1920-B relevant to this proceeding and within the Commission's jurisdiction to consider?

OPC Position: Yes, FERC Order Nos. 1920, 1920-A, and 1920-B are relevant to this proceeding and within the Commission's jurisdiction to consider to the extent FERC Order Nos. 1920, 1920-A, and 1920-B are in effect with regards to this project and consideration and enforcement under federal law and state law has been delegated to the state.

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?

OPC Position: No, it appears that FPL's planning processes may not have fully complied 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 lines or transmission improvements and Rule 25-22.076(5)(b)&(f), F.A.C., which requires a statement whether the proposed transmission line or lines will improve intra- or inter-system power transfer capabilities and improve system economics.

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 403.521, 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?

OPC Position: No, it appears that FPL’s planning processes may not have complied with the Section 403.521, Florida Statutes, intent to consider overall system economic 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?

OPC Position: No, it appears that FPL’s planning processes may not have comply with prudent utility practice because FPL failed to consider other available measures required by rule and statute that would satisfy FPL’s claimed reliability needs and the need for abundant, low-cost electrical energy.

5. **STIPULATED ISSUES**

As discovery is barely underway, OPC is not aware of any issues that can be stipulated at this time.

6. **PENDING MOTIONS OR OTHER MATTERS**

The OPC is not aware of any formal motions to be disposed of at this time.

7. **STATEMENT OF PARTY’S PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY**

There are no pending requests or claims for confidentiality filed by OPC.

8. **OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT**

OPC has no objections to the qualification of any witnesses as an expert in the field in which they pre-filed testimony as of the present date.

9. **SEQUESTRATION OF WITNESSES**

OPC does not request the sequestration of any witnesses at this time.

10. **STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE**

OPC is unaware of any aspect of the Order Establishing Procedure in this docket with which it cannot comply.

Respectfully submitted,

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CERTIFICATE OF SERVICE
DOCKET NO. 20260020-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 8th day of April, 2026, to the following:

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