

Bendria Fugnole

From: Ellen Plendl
Sent: Thursday, April 16, 2026 1:37 PM
To: Consumer Correspondence
Subject: Docket No 20260000
Attachments: Structural risk in large-load planning and electrification

See attached customer correspondence for Docket 20260000.

Bendria Fugnole

From: neil@persistenceanalyticsgroup.com
Sent: Monday, April 13, 2026 12:13 PM
To: Consumer Contact; governorrn.desantis@eog.mvflorida.com;
ltgovernorieanette.nunez@eog.myflorida.com
Subject: Structural risk in large-load planning and electrification

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To the Commission —

As Florida continues to attract large electrical loads and expand electrification across critical sectors, there is a structural issue in current planning frameworks that may warrant closer attention.

Most infrastructure, rate design, and interconnection decisions are being made under the assumption that projected demand is:

- permanent
- predictable
- and infrastructure-grade

In practice, portions of that demand are not.

Across large-load categories, demand increasingly separates into:

- durable load
- conditional load (contract, price, or policy dependent) • and transient load (relocatable or short-cycle)

When these categories are aggregated and treated as uniformly durable, it creates a dual risk:

- Underbuilding where true persistent demand exists • Overbuilding against demand that may not persist

This becomes particularly relevant as electrification accelerates in sectors such as healthcare and commercial infrastructure, where additional load is layered onto systems already under pressure.

The issue is not simply how much demand is coming — but how much of that demand is structurally durable enough to plan around.

As Florida evaluates grid reliability, cost allocation, and infrastructure investment, incorporating demand durability as a planning dimension may help reduce long-term risk and improve capital efficiency.

Respectfully,
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