

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Determination of Need for  
Andytown-Oasis Transmission Lines in  
Broward and Miami-Dade Counties, by  
Florida Power & Light Company

Docket No. 20260020-EI

Filed: April 20, 2026

**FLORIDA POWER & LIGHT COMPANY'S RESPONSE IN OPPOSITION TO  
THE ENVIRONMENTAL DEFENSE FUND, INC.'S MOTION TO COMPEL**

Florida Power & Light Company ("FPL"), pursuant to Rule 1.280(c)(1), Florida Rules of Civil Procedure, Rules 28-106.204(1) and 28-106.206, Florida Administrative Code ("F.A.C."), and this Commission's Order Establishing Procedure, Order No. PSC-2026-0056-PCO-EI ("OEP"), submits the following Response in Opposition to the Environmental Defense Fund, Inc.'s ("EDF") Motion to Compel ("Motion"). EDF's Motion should be denied. It does not identify any genuine failure to answer discoverable requests. Instead, EDF seeks to compel material outside the narrow scope of this need determination, to relitigate objections already explained in conferral, and to demand fuller or different answers to requests FPL already answered. The applicable discovery rules and case law do not permit that.

This proceeding is governed by section 403.537, Florida Statutes ("F.S."), and the Commission's OEP. Discovery reaches only nonprivileged matter relevant to a party's claim or defense and proportional to the needs of the case. EDF's challenged discovery requests seek robust and detailed information and data related to the existing and future regional transmission planning processes under Federal Energy Regulatory Commission's ("FERC") Order No. 1000 and FERC Order Nos. 1920, 1920-A, and 1920-B (hereinafter, collectively, "FERC Order 1920" or "Order 1920"). The fundamental flaw with these requests is that there is no dispute that these regional transmission planning processes were not used or applied to identify the need for the Andytown-Oasis Project ("AOP") that is pending for the Commission's determination of need in this

proceeding. And, importantly, contrary to EDF's brazen and blatant misrepresentation of the Prehearing Officer's prehearing order, there has been no finding that the FERC and FRCC issues raised by EDF are relevant. EDF's credibility concerning their FERC arguments fail due to the same lack of credibility and relevance.

As FPL has repeatedly explained in testimony, discovery, deposition, and in response to EDF's discovery conferral letter: (i) the AOP is not a regional transmission project because the need is local and does not benefit other FERC-jurisdictional transmission providers; (ii) the need for the AOP was not identified through the Florida Reliability Coordinating Council's ("FRCC") most recent 2025 regional transmission planning process; and (iii) the AOP is a local project to resolve undisputed, local violations of mandatory NERC Reliability Standards. These material facts are not in dispute in this proceeding. Indeed, EDF's own Prehearing Statement concedes that "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." *See* Order No. PSC-2026-0091-PHO-EI, p. 9 (reflecting EDF's position on Issue A). Thus, EDF has conceded and agrees that the regional transmission planning processes under FERC Order 1000 and 1920 are not applicable to the AOP and, consequently, not relevant to the actual facts and issues to be decided by this Commission. This should be the end of the inquiry rather than wasting the Commission's and FPL's time and resources addressing a motion to compel the production of information and details that EDF admits are not relevant just six days before the final hearing.

EDF cannot manufacture relevance or jurisdiction by dictating a volume of irrelevant requests and materials. This would be an entirely different case if the AOP was actual identified through the regional transmission planning processes. But as EDF agrees, it was not. The Commission should disregard EDF's attempt to hijack this proceeding for purposes of seeking

discovery to further advance EDF's advocacy at the FRCC and FERC regarding the enforcement and implementation of the regional transmission planning process under FERC Orders 1000 and 1920 – and not to address the issue at hand, which is the undisputed local need for the AOP project in this docket.

For these reasons, as further explained below, the Commission should deny EDF's Motion.

## **I. BACKGROUND**

1. On February 9, 2026, FPL filed its Notice of Intent to file the above-referenced Petition. On March 11, 2026, FPL filed its Petition requesting an affirmative determination of need for the construction and operation of AOP. Together with its Petition, FPL submitted the direct testimony and exhibits of FPL witness Yanes in support of the need for the AOP.

2. On March 12, 2026, the Prehearing Officer issued the OEP, which established procedures, processes, and timelines for this docket consistent with the legislative timelines established in Section 403.537(1)(a), F.S. The OEP set April 23, 2026 as the date for hearing on FPL's petition.

3. On March 27, 2026, EDF served its First Set of Interrogatories (Nos. 1-28) and First Request for Production of Documents (Nos. 1-19) to FPL.

4. On April 3, 2026, EDF served its Second Set of Interrogatories (Nos. 29-32) and Second Requests for Production of Documents (Nos. 20-23) to FPL.

5. FPL timely served its objections and responses to EDF's First Set of Interrogatories and First Request for Production of Documents on April 3, 2026, and timely served its objections and responses to EDF's Second Set of Interrogatories and Second Request for Production of Documents on April 6, 2026. FPL's pleadings associated with the April 3, 2026 and April 6, 2026 responses are attached as **Appendices A and B**, respectively.

6. On April 7, 2026, the deadline to complete discovery established in the OEP was reached.

7. EDF waited until after discovery closed to complain about dozens of FPL's responses. It was not until April 13, 2026 that EDF sent a letter ("Conferral Letter") identifying 34 FPL responses EDF claims to be insufficient. FPL responded to EDF's Conferral Letter on April 15, 2026 with detailed explanation supporting the appropriateness of FPL's objections and responses. FPL's response to EDF's Conferral Letter is provided as **Appendix C**.

8. On April 15, 2026, the Commission issued its Prehearing Order, Order No. PSC-2026-0091-PHO-EI ("PHO"), in advance of the April 23, 2026 hearing date.

9. EDF wasted even more time by sending a second conferral letter to FPL on April 16, 2026, identifying 27 questions for which EDF sought additional information. FPL responded via email on April 17, 2026 that it was standing behind its objections and responses as described in FPL's response to EDF's first Conferral Letter.

10. On April 17, 2026, the EDF Motion was filed, seeking entry of an order from the Commission compelling FPL to produce additional information for 27 interrogatories and requests for production. Specifically, EDF requests the Commission compel FPL to produce additional information concerning the following requests:

- EDF's First Set of Interrogatories Nos. 2(d), 20, 22, 24-28;
- EDF's First Request for Production of Documents Nos. 1, 5(d), 6, 8, 12-18;
- EDF's Second Set of Interrogatories Nos. 29-32; and
- EDF's Second Request for Production of Documents Nos. 20-23.

A composite document showing FPL's responses (with attachments omitted) to each of the questions that are the subject of the EDF Motion is provided as **Appendix D**. As detailed herein, FPL previously provided substantive responses for nine of the questions that are the subject of

EDF's Motion. EDF's real complaint is not that FPL failed to respond to these nine requests, but that EDF does not like the responses FPL gave. That is not a basis to compel further discovery

11. For the reasons explained herein, the discovery sought by EDF – other than that to which FPL has previously responded – is entirely unrelated to the actual facts of this case as clearly explained in FPL's testimonies, exhibits, and discovery responses. Rather, the majority of these discovery questions are related to the current regional transmission planning process under FERC Order 1000 and the future regional transmission planning process under FERC Order 1920, which EDF concedes were not applied to identify the need or proposed solution to resolve that need that is currently pending before this Commission.

## **II. STANDARD FOR DISCOVERY**

12. Rule 28-106.206, F.A.C., governs discovery in administrative proceedings and incorporates Rules 1.280 - 1.400 of the Florida Rules of Civil Procedure. Pursuant to Rule 1.280(c)(1), Florida Rules of Civil Procedure, parties may obtain discovery only of nonprivileged matter that is relevant to a party's claim or defense and proportional to the needs of the case. The rule further directs consideration of, among other things, the importance of the issues, relative access to information, party resources, and whether the burden or expense outweighs the likely benefit.

13. Discovery is not boundless. *In re: Complaint of Mad Hatter Utility, Inc., and Paradise Lakes Utility, LLC against Verizon Florida, Inc.*, Docket No. 20090313-PU, Order No. PSC-2010-0021-PCO-PU, 2010 Fla. PUC LEXIS 53 at \*2-3 (Fla. P.S.C. Jan, 7, 2010). Even under Florida's liberal discovery rules, the information requested must be tied to a claim or defense in the pending case and proportional to the needs of that case. Fla. R. Civ. P. 1.280(c)(1); *In re: Petition for rate increase by Tampa Electric Company*, Docket No. 2030040-EI, Order No. PSC-

2013-0415-PCO-EI, 2013 Fla. PUC LEXIS 259 at \*4 (Fla. P.S.C. Sept. 6, 2013) (citing *Poston v. Wiggins*, 112 So.3d 783 (Fla. 1st DCA 2013)).

14. It is well settled that the burden of establishing relevance is on the questioner. *See Calderbank v. Cazares*, 435 So.2d 377 (Fla. 5th DCA, 1983). The standard placing the burden on the questioner was clearly explained by the court in the *Calderbank* decision:

A reasonably “calculated” causal connection between the information sought and the possible evidence relevant to the issues in the pending action must “appear” from the nature of both or it must be demonstrated by the person seeking the discovery. If a logical connection is not readily apparent, the questioner should make it apparent by pointing out to the court his reasoning process based on facts and inferences demonstrating how he calculates that the sought information will “reasonably” lead to admissible evidence. The mere fact that an inquiry that appears to be irrelevant “might” lead to evidence that is relevant and admissible to the issues in the pending suit is not sufficient. Such a rule would place no limitation on the authority of any litigant to invade, by questions, the privacy of a witness.

*Id.* at 379 (emphasis added). This standard has been consistently applied by the Commission.<sup>1</sup>

Thus, EDF must show a logical, non-speculative connection between what it seeks and evidence relevant to the actual facts and issues to be decided this docket.

15. As explained in detail below, EDF has failed to demonstrate that the discovery requests that are the subject of its Motion are relevant or proportional to FPL’s proposed AOP or the Commission’s review thereof. Therefore, the EDF Motion should be denied.

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<sup>1</sup> *See, e.g., In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company*, Docket No. 20200070-EI, Order No. PSC-2020-0161-PCO-EI, 2020 FLA. PUC LEXIS 270 at \*17-18 (Fla. P.S.C. May 18, 2020); *In re: Request for arbitration concerning complaint of Intermedia Communications, Inc. against BellSouth Telecommunications, Inc. for breach of terms of interconnection agreement under Sections 251 and 252 of the Telecommunications Act of 1996, and request for relief*, Docket No. 19991534-TP, Order No. PSC-2000-2035-PCO-TP2000, Fla. PUC LEXIS 706 at \*4-5 (Fla. P.S.C. June 13, 2000); *In re: Petition of BellSouth Telecommunications, Inc. to remove interLATA access subsidy received by St. Joseph Telephone & Telegraph Company*, Docket No. 19970808-TL, Order No. PSC-1998-0465-FOF-TL, 1998 Fla. PUC LEXIS 631 at \*14 (Fla. P.S.C. March 31, 1998).

### III. RESPONSE

#### A. General Response to EDF's Motion

16. The EDF Motion does not identify bona fide discovery deficiencies. Instead, it seeks to reopen closed discovery, pursue information outside the scope of this need determination proceeding, and demand different answers to requests that FPL has already answered. That is not the proper function of a motion to compel.

17. The threshold problem with EDF's position and, by extension, the discovery it seeks to compel, is jurisdictional.<sup>2</sup> The Commission is a creature of statute and may exercise only the authority the Legislature has actually conferred. *Citizens of State v. Graham*, 191 So. 3d 897, 900 (Fla. 2016).<sup>3</sup> Section 403.537, F.S., does not purport to confer authority over federal regional planning governance, over the content or legality of existing or future FERC tariffs, over FRCC or any region-level planning rules, or over challenges to the enforcement or implementation of FERC's own Orders 1000 or 1920. Indeed, the statute recognizes the limitations of the Commission's jurisdiction by expressly limiting the matters that may be considered to "other matters within its jurisdiction deemed relevant to the determination of need." *Id.* As EDF's own witnesses concede, FERC has exclusive federal regulation of interstate transmission planning pursuant to the Federal Power Act, 16 U.S.C. §§ 791, *et seq.* (See Direct Testimony of EDF witness Thomas, p. 7; Direct Testimony of EDF witness Cranston, p. 13.) Seeking discovery in this proceeding to pursue issues that are not jurisdictional to the Commission, as EDF is doing, necessarily renders that discovery improper, as no relevant information can be retrieved.

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<sup>2</sup> Florida Rule of Civil Procedure 1.140(b) treats lack of subject-matter jurisdiction as a fundamental defect that may be raised at any time, which underscores that jurisdiction is not a technicality but a threshold limit on adjudicative power.

<sup>3</sup> Citing *United Tel. Co. of Fla. v. Fla. Pub. Serv. Comm'n*, 496 So. 2d 116, 118 (Fla. 1986); and *Sprint-Florida, Inc. v. Jaber*, 885 So. 2d 286, 290 (Fla. 2004).

18. The Motion confirms EDF's pursuit of non-jurisdictional issues that belong elsewhere. As the Motion itself makes plain, the bulk of EDF's desired discovery relates to FRCC governance and processes and the implementation of FERC Orders 1000 and 1920. Contrary to the position of EDF, those issues are not before the Commission in this proceeding, and, moreover, have no relevance to the AOP.

19. EDF's discovery requests, and entire presentation in this proceeding, regarding the regional transmission planning processes under FERC Orders 1000 and 1920 are a transparent attempt to manufacture relevance where none exists. However, those issues are not before this Commission on this record. In testimony, discovery, and deposition, FPL repeatedly explained that: (i) the AOP is not a regional transmission project because the need is local and does not benefit other FERC-jurisdictional transmission providers, such as Duke Energy Florida or Tampa Electric Company, as required to qualify as a regional transmission project;<sup>4</sup> (ii) the need for the AOP was not identified through the FRCC's most recent 2025 regional transmission planning process; and (iii) the AOP is a local project to resolve undisputed, local violations of mandatory NERC Reliability Standards. *See, e.g.,* Rebuttal Testimony of FPL witness Yanes, p. 10. These material facts are not in dispute or otherwise contested in this proceeding. Again, EDF's own Prehearing Statement concedes that "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." *See* PHO, p. 9 (reflecting EDF's position on Issue A). Thus, there is no material dispute that the regional transmission planning processes were not

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<sup>4</sup> Under Order No. 1000, and by extension Order No. 1920's continued use of the regional planning framework, a project is "regional" only if it arises from a regional planning process that cannot be satisfied by a single transmission provider acting alone. *See* Order No. 1000, 136 FERC ¶ 61,051, P 160 (2011) ("an individual public utility transmission provider cannot, by itself, satisfy the regional transmission planning requirements"); *S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41, 46–48 (D.C. Cir. 2014) (describing Order No. 1000 as requiring participation in a regional transmission planning process that produces a regional transmission plan, with regional-cost-allocation principles tied to beneficiaries).

used and are not applicable to the need for the AOP or the identification of a viable solution to resolve that local need. It would be an entirely different matter if the need or solution was, in fact, identified through the FERC Order 1000 transmission planning processes, but that is not the case before this Commission.

20. The regional transmission planning under FERC Order 1920 is even less relevant because there is no FERC-approved planning regime currently in effect. FPL has explained that the FERC Order 1920 compliance filing date for the Florida transmission providers has been extended to June 12, 2026, and after FPL's FERC compliance filing is submitted and approved by FERC, the first FRCC planning cycle under FERC Order 1920 would start on January 1, 2028, and would conclude no later than January 1, 2031. In fact, EDF admits in its Prehearing Statement that there currently is no FERC-approved Order 1920 transmission planning process in effect for FPL. *See* PHO, p. 10 (reflecting EDF's position on Issue B).

21. EDF's apparent dissatisfaction with that ongoing federal process does not somehow make the implementation and application of the FERC Order 1920 transmission planning process ripe or relevant for consideration in this need determination. Simply put, the regional transmission planning processes, whether under FERC Order 1000 or 1920, are not applicable to the local reliability need or solution that is actually pending before this Commission in this proceeding because, as EDF admits, they were not used or applied to determine the need for the AOP.

22. The data requested by EDF related to these federal regional transmission planning processes is sought to further advance EDF's advocacy at the FRCC and FERC regarding the enforcement and implementation of the regional transmission planning process under FERC Orders 1000 and 1920 – not to address the undisputed local need for the AOP project in this docket. This improper purpose is illustrated by EDF's own Motion, which claims:

EDF's contention in response to FPL's Petition is that the FRCC process as presented appears structurally deficient and serves as a

box to check under regional planning, but does not lead to good faith planning. As evidence, FRCC has not produced a single regional transmission project in over a decade. If the information obtained through discovery reveals that the FRCC is not effectively conducting the independent regional planning mandated by Order 1000—whether due to flawed governance, lack of independent personnel, or coordinated voting by incumbent utilities like FPL—then FPL cannot use the FRCC as a shield.

*See* Motion, p. 5 (emphasis added). This admission by EDF demonstrates that the true purpose and intent of EDF’s disputed discovery requests is to litigate the alleged defects and complaints with FRCC’s existing regional transmission planning process under FERC Order 1000. As explained above, such issues are beyond the jurisdiction of the Commission and must be pursued through the avenues federal law provides: before FERC, through the relevant federal complaint, tariff, compliance, or rehearing process, and then in the federal courts of appeals as authorized by the Federal Power Act.

23. EDF’s requested production schedule also confirms that much of this material is not sought for hearing in this proceeding.<sup>5</sup> FPL submits that the Commission should not permit intervenors to abuse the discovery process for the purpose of procuring information that they desire to use in other forums – particularly here, where EDF has admitted such information is not applicable to the proposed AOP pending for this Commission’s need determination.

24. EDF’s contention that Section 366.04(5), F.S., (a component of the “Grid Bill”) assures EDF the right to take discovery in this case on broader regional transmission processes and procedures is similarly misguided. *See* Motion, p. 4. Section 366.04(5) does not convert every

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<sup>5</sup> EDF requests in its Motion that information be produced either at the start of the hearing or “5 days prior to the due date for the briefs in this case, coupled with entry of the information in the record.” Motion, p. 23. Five days prior to the due date for briefs is the day *after* the hearing. Therefore, EDF does not necessarily seek to use any of the requested information at hearing, but desires it nonetheless. If the information requested is not needed for the purpose of hearing or cross-examination, that is strong indication that the information is not relevant to the current proceeding and is likely being sought for ulterior purposes (*i.e.*, to pursue issues that belong elsewhere).

TLSA need case into a free-ranging inquiry into regional planning policy or invite an adjudication of the validity, content, implementation, or wisdom of FERC's regional transmission planning regime that EDF agrees was not applied to the proposed AOP. And it certainly does not authorize discovery untethered to the statutory need factors in Section 403.537, F.S., or the actual facts of the project pending before this Commission. The issues set forth in the PHO make clear that the Commission is investigating the correct statutory factors for determining whether to approve FPL's petition, and, as explained, those factors do not give rise to a need to evaluate current or future FRCC or FERC regional planning efforts that were not used for the proposed AOP.

25. Contrary to the view of EDF, the Prehearing Officer's decisions not to strike testimony regarding the impacts of FERC Orders 1000 and 1920 and to allow two issues on the relevance of those orders does not suddenly legitimize EDF's requested discovery, nor did the Prehearing Office conclude that such issues were relevant. Rather, the Prehearing Officer concluded that, if the motion to strike were granted, the Commission would not have the opportunity to hear the arguments on the alleged relevance and materiality of the FERC Orders to this need determination, which the Prehearing Officer deferred to the Commission rather than to just a single Commissioner sitting as the Prehearing Officer. *See* PHO, p. 28. Notably, the issues that the Prehearing Officer allowed in the case (Issues A and B) are whether FERC Order 1000 and FERC Order Nos. 1920, 1920-A, and 1920-B are "relevant to this proceeding and within the Commission's jurisdiction to consider." *See* PHO at 8-11, 30. These issues only set forth a basis on which the parties may contend *whether or not* these considerations are jurisdictional and relevant to the case. If the Prehearing Officer had ruled that the FERC Order 1000 and 1920 processes were relevant to the proceeding, as EDF incorrectly claims in its Motion, these two issues as written would be moot.

26. The PHO, however, reflects the opposite. The Prehearing Officer specifically acknowledged that the testimonial evidence offered by EDF concerning the FERC orders could have zero relevance to the issues presented in the case. *See* PHO, p. 28.

27. Thus, EDF's assertion that "the Prehearing Officer held that FERC Orders 1920 and 1000 are relevant to this proceeding" (Motion, p. 4) is plainly wrong and mischaracterizes the Prehearing Officer's ruling. Instead, the ruling presupposes that EDF's evidence on FERC Orders 1000 and 1920 could be wholly irrelevant, and it certainly does not signal that EDF has carte blanche to query FPL in all aspects of its participation in, and communications with, regional planning entities.<sup>6</sup>

28. EDF's Motion also includes demands for more narrative, more detail, or different phrasing than FPL provided in its original responses. A motion to compel is not a device to force a party to adopt an adversary's framing, theory, or preferred level of narrative detail. FPL answered. EDF simply does not like the answers. To the extent EDF believes FPL's responses do not support FPL's positions on the merits, EDF's remedy is to test those issues through cross-examination and argument to the Commission, not through an untimely motion to compel.

29. The timing and breadth of EDF's demands strongly suggest an effort to prolong or complicate this expedited proceeding rather than to resolve legitimate discovery disputes. This is apparent from the filing of this Motion less than a week prior to hearing. The intent to delay is also apparent from the attempts made by EDF to postpone the outcome of this proceeding through two separate motions to alter the case's procedural schedule, the first of which has already been

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<sup>6</sup> It should also be noted that FERC's Order 1920 process extends well into the future. FPL's rebuttal testimony establishes that the Florida compliance filing is not due until June 12, 2026, that the first Order 1920 planning cycle would not begin until January 1, 2028, and would not conclude until no later than January 1, 2031. Waiting for that future process would leave insufficient time to develop and place this project in service by December 2033, which further calls into question the relevance of EDF's discovery concerning FERC Order 1920.

denied. *See* Order No. PSC-2026-0084-PCO-EI. EDF's Motion is designed to improperly burden FPL, distract from the issues actually before the Commission, and inject delay into an expedited statutory proceeding.

## **B. Specific Responses to EDF's Motion to Compel**

30. The discovery sought by EDF through its Motion can be categorized into four groups: (i) questions regarding FPL's representation at FRCC and its engagement in processes orchestrated through the FRCC and FERC; (ii) questions regarding the record in Docket No. 20250011-EI and interregional power transfers; (iii) questions regarding FPL's monitoring and maintenance of its transmission infrastructure; and (iv) questions concerning FPL's modeling, assumptions, and evaluation of alternatives to which FPL already replied. Each of those groupings are addressed in the following subsections. In each category, EDF fails for the same three reasons: irrelevance, disproportionality, and the absence of any actual failure by FPL to respond.

*i. EDF's Questions Regarding FPL's Representation at FRCC and its Engagement in Processes Orchestrated through the FRCC and FERC Are Not Directed at Eliciting Information Relevant to this Proceeding*

31. The bulk of the questions that are the subject of EDF's Motion are related to regional FRCC and FERC planning processes that have no relevance to the current proceeding. These questions include EDF First Set of Interrogatories Nos. 4, 24, 25, 26; EDF Second Set of Interrogatories Nos. 29-32; EDF First Request for Production of Documents Nos. 5(d), 16; and EDF Second Request for Production of Documents Nos. 20-23, which request the following information:

INT 24: *Please identify every FPL employee, officer, or external consultant acting on FPL's behalf who currently serves, or has served at any point within the past five (5) years, in any official capacity within the FRCC. This request specifically includes, but is not limited to, membership on the Board of Directors, the Planning Committee, the Transmission*

*Working Group, or any committee, subcommittee, or task force involved in the BTPP. For each individual identified, please provide: a. Their current functional job title and department within FPL. b. Their specific role, title, and committee assignment(s) within the FRCC. c. A detailed description of their responsibilities and duties within their FRCC role. d. Whether the individual possesses voting rights within their respective FRCC committee or working group.*

INT 25: *For each individual identified in response to Interrogatory No. 25, please explicitly state whether that individual had any direct or supervisory role in the internal identification, load-flow modeling, alternatives assessment, or management approval of the localized AOP proposed in this docket.*

INT 26: *Please describe in detail the governance mechanisms, voting protocols, and consensus requirements utilized by the FRCC during the BTPP to evaluate localized utility plans and determine whether a CEERTS should be selected. Specifically, please address: a. Does FPL, through its representatives on FRCC committees, hold veto power or the ability to block the selection of a CEERTS that would replace or modify an FPL-proposed localized transmission project? b. Please describe any internal FPL protocols, ethical guidelines, or operational "firewalls" in place to ensure that FPL employees serving on FRCC planning committees evaluate regional transmission alternatives independently and objectively, rather than strictly advancing FPL's internal capital expenditure plans.*

INT 29: *Identify every communication, meeting, or discussion—whether internal to FPL or external—in which the proposed Andytown-Oasis Project (AOP), or the reliability needs that FPL has identified in support of the AOP project, was discussed in relation to the Florida Reliability Coordinating Council (FRCC), the Biennial Transmission Planning Process (BTPP), or any potential regional transmission alternative. In your response, explicitly identify: a. Any communications between FPL personnel and FRCC staff, committee members, or external consultants regarding whether the AOP (or the constraints it resolves) should be modeled, evaluated, or designated as a regional project. b. Any communications between FPL personnel and representatives of other Florida electric utilities regarding the AOP and its potential impacts on the regional grid. c. Any internal communications or strategy discussions among FPL management, planners, or regulatory staff regarding how to present, or whether to present, the AOP to the FRCC.*

INT 30: *Identify every communication, meeting, or discussion—whether internal or external—regarding FPL's strategic posture, voting directives, or policy objectives within the FRCC's regional transmission planning processes over the last five (5) years. In your response,*

*explicitly identify: a. Any internal FPL directives, talking points, or guidelines provided to FPL employees serving on FRCC committees regarding how to evaluate, vote on, or respond to proposed regional transmission projects. b. Any communications between FPL and other Florida utilities coordinating votes, policy positions, or responses to stakeholder proposals within the FRCC.*

INT 31: *Identify every internal or external communication, analysis, or strategic evaluation conducted by or on behalf of FPL regarding FERC Order 1000 and its mandate to identify Cost Effective or Efficient Regional Transmission Solutions (CEERTS). This includes, but is not limited to, communications explaining, questioning, or analyzing why the FRCC BTPP has consistently failed to identify or mandate regional transmission solutions in lieu of localized utility projects within FPL's service territory.*

INT 32: *Identify every internal or external communication, analysis, or strategic evaluation conducted by or on behalf of FPL regarding FERC Order 1920. In your response, explicitly identify: a. Any communications, internal memoranda, or consultant reports evaluating how Order 1920's mandate for long-term regional planning and "right-sizing" of local projects will impact FPL's capital expenditure plans or local transmission projects. b. Any communications between FPL and FRCC staff, or between FPL and other Florida utilities, regarding the strategy for drafting the FRCC's compliance filing for Order 1920. c. Any internal communications discussing whether the timing, scope, or necessity of the AOP is influenced by the impending implementation of Order 1920.*

POD 5(d): *Internal documents generated by FPL employees serving in roles at FRCC related to most recent BTPP and FERC Order 1920 compliance development process.*

POD 6: *Please produce the complete final study reports, appendices, and all associated native electronic modeling files for every FRCC BTPP conducted over the past ten (10) years (i.e., planning cycles from 2016 through the present). For clarity, this production request explicitly includes, but is not limited to: a. The final, approved BTPP reports detailing the system needs and approved regional or local transmission plans. b. All "Base Case" and "Change Case" power flow models (in native, executable formats such as PSS/E or PSLF) utilized to evaluate Florida's transmission constraints during each respective BTPP cycle. c. All economic dispatch models or production cost simulations utilized during each respective cycle to evaluate the economic impact of transmission congestion or the benefits of proposed solutions.*

POD 16: *Please produce all current organizational charts, committee rosters, charters, and bylaws for the FRCC committees and working groups on*

*which FPL employees currently serve, specifically including any documents governing member voting rights and dispute resolution within the BTPP.*

- POD 20: *Produce all documents, analyses, and communications identified in, relied upon, or relating to your response to Interrogatory No. 29. This request explicitly encompasses all internal emails, instant messages (e.g., Microsoft Teams, Slack), memoranda, and handwritten notes, as well as all external correspondence with FRCC staff, other utilities, and third-party consultants regarding the interplay between the AOP and the FRCC planning process.*
- POD 21: *Produce all documents, analyses, and communications identified in, relied upon, or relating to your response to Interrogatory No. 30. This includes all internal strategy documents, voting guides, and coordination emails between FPL and other FRCC member utilities designed to establish consensus, align voting, or dictate outcomes within the FRCC Biennial Transmission Planning Process.*
- POD 22: *Produce all internal and external communications, legal memoranda, white papers, consultant reports, and economic analyses relating to FPL's compliance with, interpretation of, or strategic response to FERC Order 1000's regional planning mandates. This explicitly includes any internal correspondence discussing the absence of CEERTS projects within the Florida peninsula.*
- POD 23: *Produce all internal and external communications, legal memoranda, white papers, consultant reports, and economic analyses relating to FERC Order 1920. This request specifically demands the production of:*  
*a. All internal emails and strategy documents discussing how the Order 1920 mandates for "right-sizing" and advanced technology evaluations will affect FPL's local transmission planning and future Need Determinations. b. All communications, draft redlines, and meeting notes between FPL, FRCC staff, and other Florida utilities regarding the development of the FRCC's regional compliance strategy for Order 1920. c. All internal correspondence or analyses discussing whether to accelerate, modify, or advance localized projects (including the AOP) prior to the full implementation of the Order 1920 regional planning framework.*

32. FPL objected to each of these requests as being irrelevant and unlikely to lead to the discovery of admissible evidence, and provided responses notwithstanding objection to

Interrogatory No. 26 and Request for Production No. 5(d).<sup>7</sup> Those objections were proper because the requests are not relevant to any claim or defense in this docket and are grossly disproportionate to the needs of this expedited proceeding.

33. Collectively, these questions are directed at eliciting information concerning FPL's participation in FRCC and FERC processes, as they are applicable to regional transmission planning. More specifically, the questions request information, analysis, and communications concerning FRCC, the FRCC's BTPP, the FERC Order 1920 regional planning framework, and the FERC Order 1000 process and its mandate to identify CEERTS. However, as explained in detail above, these are not relevant because, as EDF admits, the FERC Order 1000 and FERC Order 1920 regional transmission planning process were not used or applied to identify the local need or the proposed solution to resolve that local need that is currently pending before this Commission.

34. There is no legal basis for compelling FPL's production of this information. EDF's endeavor to challenge the enforcement or implementation of regional transmission planning under FERC Orders 1000 and 1920 are outside the scope of this proceeding and beyond the jurisdiction of the Commission.<sup>8</sup> Those collateral matters are therefore irrelevant and immaterial to the issues before the Commission in this docket and are inappropriate, immaterial, and irrelevant subject matters for discovery in this case. EDF cannot bootstrap broader disputes about FRCC processes or federal transmission planning mandates into this local need determination case through discovery.

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<sup>7</sup> FPL also objected to Interrogatory Nos. 24-26, 29-32 and Production of Documents Nos. 5(d), 6, 16, 20-23 on the ground that they are overly burdensome.

<sup>8</sup> The Supreme Court has repeatedly held that state tribunals may not collaterally attack matters committed to FERC's exclusive authority. *See Mississippi Power & Light Co. v. Mississippi ex rel. Moore*, 487 U.S. 354, 371-73 (1988); *Nantahala Power & Light Co. v. Thornburg*, 476 U.S. 953, 966-67 (1986).

35. For this same reason, EDF cannot cure the objectionable nature of its questions by more narrowly circumscribing the information requested in Interrogatory Nos. 24, 25, 31, and 32, as it offers to do in its Motion. *See* Motion, pp. 10, 15. Even with less information sought, the subject matter of these questions is still irrelevant and beyond the scope of the proceeding.

36. The burden of establishing relevance is on the questioner. *See Calderbank*, 435 So.2d 377. Here, for the reasons previously stated, EDF simply cannot do that with regard to any of the questions listed above, as each is directed at litigation or federally mandated processes that are not before this Commission.

37. While EDF describes FPL's objections as "boilerplate" and insufficient, EDF is mistaking "boilerplate" objections with objections that are alike because they are being asserted on similar grounds to questions that repetitively seek information beyond the scope of the proceeding. Similar objections to similar requests are not "boilerplate"; they are what happens when one side repeatedly serves the same defective request in different forms.

38. Interrogatory Nos. 24-26, 29-32 and Production of Documents Nos. 5(d), 6, 16, 20-23 are also overly burdensome. The Florida Supreme Court has established that whether a request is unduly burdensome is a question that must be answered on a case-by-case basis.<sup>9</sup> On their face, these requests demand multi-year searches of internal and external communications, committee activities, voting directives, and consultant analyses on topics outside the issues for hearing. That burden is wildly out of proportion to any legitimate need in this docket – in particular where both

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<sup>9</sup> *See Worley v. Cent. Fla. Young Men's Christian Ass'n, Inc.*, 228 So. 3d 18, 26 (Fla. 2017) ("In determining whether the ordered discovery would constitute an undue burden, courts look to the facts of each case."), citing *Schering Corp. v. Thornton*, 280 So.2d 493, 494 (Fla. 4th DCA 1973) ("We do not here attempt to delineate the point at which the burden becomes unreasonable, and indeed, it must necessarily be a case by case decision under the applicable circumstances.").

EDF and FPL agree that the federal regional transmission planning processes under FERC Orders 1000 and 1920 were not applied in this case to identify the need for the proposed AOP.

39. FPL maintains that its objections to each of the aforementioned questions are and remain proper and that the information sought is beyond the scope of the proceeding with no relevance to it.

ii. *EDF's Questions Regarding the Record in Docket No. 20250011-EI and Interregional Power Transfers Seek Information that is Immaterial and Irrelevant to this Proceeding*

40. EDF's Motion seeks to compel FPL to respond to questions pertaining to the record in Docket No. 20250011-EI and interregional power transfers that have no relevance to the current proceeding. These questions include EDF's First Set of Interrogatories Nos. 20, 22 and EDF's First Request for Production of Documents Nos. 14, 15, which request the following information:

INT 20: *During FPL's 2025 base rate case, Vice President of Finance Scott Bores testified that "FPL's ability to supply power purchased from outside of Florida if there is a significant need or disruption due to extreme weather events is more constrained than utilities with more access to regional options." With respect to this stated constraint on interregional power transfers across the Florida state line, please provide the following data and operational details: a. Quantify FPL's current total interregional physical transfer capability (in Megawatts) to import power across the Florida state line; b. Of the total interregional transfer capability identified in subpart (a), quantify how much is currently secured under firm, long-term contracts versus non-firm or spot-market availability; c. Provide the total volume of electrical energy (in MWh) that FPL imported from outside the State of Florida for each year from 2021 through 2025; d. Provide the average cost (\$/MWh) and the peak cost (\$/MWh) of the interregional power imported across the Florida state line for each year from 2021 through 2025, specifically noting the costs incurred during extreme weather events (e.g., Winter Storm Elliott, hurricanes).*

INT 22: *With respect to all power procured from other balancing authorities within Florida, or wheeled through other balancing authorities within Florida, please provide the following data and operational details: a. Provide the total volume of electrical energy (in MWh) that FPL imported from other Florida balancing authorities for each year from 2021 through 2025. b. Provide the average cost (\$/MWh) and the peak cost (\$/MWh) of the power imported from other Florida balancing*

*authorities for each year from 2021 through 2025, specifically noting the costs incurred during extreme weather events (e.g., Winter Storm Elliott, hurricanes). c. Provide the wheeling rates paid by FPL for all power wheeled through other Florida balancing authorities for each year from 2021 through 2025, as well as the total volume of electrical energy (in MWh) wheeled under each rate.*

POD 14: *Please produce all data, load-flow studies, economic analyses, or internal memoranda that FPL management or Scott Bores relied upon in his testimony in Florida PSC Docket No. 20250011-EI (the 2025 FPL rate case) to conclude that FPL’s ability to supply power from outside of Florida is “more constrained than utilities with more access to regional options.”*

POD 15: *Please produce all current interregional power purchase agreements, firm transmission service agreements, and pricing term sheets governing the importation of wholesale power from outside the State of Florida into the FPL balancing authority.*

41. FPL objected to each of these requests on the basis of relevance.<sup>10</sup> These requests are a transparent detour into another docket and a different policy debate. This case is about whether AOP is needed to solve identified local reliability violations, not about mining the 2025 rate case or Florida’s import capability for use elsewhere. Further, the data and details on interregional power transfers across the Florida state line are immaterial and irrelevant here because, as explained above and repeatedly in FPL’s testimony and discovery objections, the AOP is needed to resolve undisputed local violations of the mandatory NERC Reliability Standards. The data requested by this discovery request is sought to further advance EDF’s advocacy at the FRCC and FERC regarding the enforcement and implementation of the regional transmission planning process under FERC Orders 1000 and 1920 – not to address the undisputed local need for the AOP project in this docket.

42. EDF’s attempt to pursue those collateral subjects through discovery in this docket is improper and out of proportion to any legitimate need in this docket. These requests do not bear

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<sup>10</sup> FPL also objected to Interrogatory Nos. 20, 22 on the ground that they are overly burdensome.

on whether the AOP is needed to address the identified local reliability violations.

43. Interrogatory Nos. 20, 22 were also appropriately objected to as overly burdensome. FPL submits that that objection is appropriate to avoid the unnecessary time and expense burden that would be required to obtain information that has no bearing on the issues to be resolved by the Commission.

iii. *EDF's Questions Regarding FPL's Monitoring and Maintenance of its Transmission Infrastructure Seek Information that is Irrelevant to this Proceeding*

44. The EDF Motion seeks to compel FPL to respond to questions pertaining to its transmission monitoring and maintenance practices that have no relevance to the current proceeding. These questions include EDF's First Set of Interrogatories Nos. 27, 28 and EDF's First Request for Production of Documents Nos. 17, 18, which request the following information:

INT 27: *Identify and describe in detail the databases, tracking systems, asset management programs, and long-term planning documents utilized by FPL to monitor the condition, life expectancy, and planned replacement schedule of its existing transmission infrastructure. In your response, please explicitly detail: a. The specific engineering criteria, condition assessments, or operational metrics (e.g., chronological age, physical deterioration, failure rates, thermal limits) FPL utilizes to flag a transmission facility for targeted replacement or rebuild. b. The timeframe or planning horizon over which FPL projects its infrastructure replacement schedules (e.g., 5-year, 10-year, or 20-year capital plans). c. The specific internal department(s) or committee(s) responsible for maintaining this data and authorizing the replacement schedules.*

INT 28: *When an existing transmission facility is identified as aging, deteriorating, or requiring replacement, describe in detail the analytical process and economic modeling FPL utilizes to determine the optimal replacement solution. Specifically, please address: a. Whether FPL's internal planning criteria permit automatic "like-for-like" replacements, or whether a holistic needs assessment is required for each aging asset. b. Whether FPL requires planners to affirmatively consider, model, and evaluate and GETs, including advanced conductors, as alternatives to defer the capital cost of a full infrastructure rebuild. c. If FPL does not routinely evaluate GETs as alternatives to replacing aging infrastructure, please explain how FPL ensures that its replacement capital expenditures satisfy the statutory requirement to deliver "abundant, low-cost electrical energy."*

POD 17 *Please produce the most current version of any capital replacement schedules, “aging infrastructure” watchlists, or asset condition assessment reports that detail planned transmission facility replacements or rebuilds over the next ten (10) years, specifically including any such facilities located within or serving the combined Miami-Dade and Broward County region.*

POD 18: *Please produce all internal manuals, engineering guidelines, and standard operating procedures documents in any format that govern or prescribe how FPL evaluates, prioritizes, and selects engineering solutions for aging or end-of-life transmission infrastructure.*

45. FPL objected to each of these requests on the basis of relevance. These questions are directed broadly at exploring FPL’s operational and monitoring practices as they relate to FPL’s existing transmission maintenance practices. The need for the AOP is unrelated to condition, life expectancy, and planned replacement schedule of FPL’s existing transmission infrastructure. EDF offers only a vague assertion that FPL’s general asset-management and replacement practices might somehow bear on whether AOP is the best option. That is not enough. The Motion never explains the required logical connection between those broad maintenance topics and the specific local reliability violations the AOP addresses. *See Calderbank*, 435 So.2d 377.

iv. *FPL Appropriately Responded to EDF’s Questions Concerning the Modeling, Assumptions, and Evaluation of Alternatives that Led to Selection of the AOP Project*

46. FPL appropriately responded to EDF’s questions associated with its modeling, assumptions, and evaluation of alternatives that led to selection of the AOP. These questions include EDF’s First Set of Interrogatories Nos. 2(d) and EDF’s First Request for Production of Documents Nos. 1, 8, 12, 13, which requested the following information:

INT 2(d): *Identify any specific data, studies, or determinations generated during the most recent FRCC BTPP that FPL affirmatively incorporated into its alternatives assessment and ultimate selection of the AOP.*

POD 1: *Please produce all data, input files, output files, workpapers, and*

*underlying assumptions utilized in any and all modeling performed by or on behalf of FPL in the planning, development, alternatives assessment, and justification of the proposed AOP. For clarity, the scope of this production request explicitly includes, but is not limited to: a. Power flow, contingency, and reliability modeling (e.g., PSS/E, PSLF) explicitly including the "Base Case" models, "Change Case" models, and specific contingency outputs demonstrating the NERC TPL-001-5.1 violations relied upon to justify the AOP. b. Production cost and economic dispatch modeling (e.g., PROMOD, PLEXOS) utilized to calculate system fuel savings, renewable curtailment impacts, economic benefits, and the dispatch of specific generation facilities projected to supply power across the AOP during Summer and Winter peaks in each of the first five years following the year in which the AOP is completed. c. Any specific sensitivity models run by FPL (e.g., high/low load growth, extreme weather, high/low natural gas prices). d. Load forecasting and spatial load allocation models. e. All spreadsheets and quantitative analyses used to calculate project capital costs, revenue requirements, or ratepayer impacts.*

POD 8: *Please produce all internal memoranda, email correspondence, presentation decks, engineering models, and cost-benefit analyses generated within the last 36 months that discuss, evaluate, compare, or dismiss any alternative to the AOP that was not formally presented as an alternative in the Petition. This explicitly includes documents evaluating the cost and efficacy of the AOP against Non-Wires Alternatives (NWAs) such as battery storage, Advanced Transmission Technologies (ATTs), or Grid-Enhancing Technologies (GETs).*

POD 12: *Please produce all internal load forecasting models, load-flow studies, and regional resource adequacy assessments that calculate or project the generation deficit, import requirements, and transmission transfer limits for the combined Miami-Dade and Broward County geographic region for the period of 2026 through 2036.*

POD 13: *Please produce all internal manuals, guidelines, planning criteria documents, standard operating procedures, and flowcharts utilized by FPL transmission planners that govern or prescribe how FPL considers and evaluates alternatives to proposed transmission projects are identified, modeled, and evaluated for the purposes of local planning and Need Determinations.*

47. Significantly, where EDF sought discovery actually tied to the AOP's planning, modeling, assumptions, and alternatives, FPL responded and produced responsive material.

48. With respect to Interrogatory 2(d), FPL provided a response that directly addressed the question posed by EDF. Specifically, FPL explained in its response that the 2025 FRCC BTPP

is based on power-flow models created by the FRCC, which are the same models utilized by FPL in its reliability assessments, the determination of the alternatives, and the ultimate selection of AOP.

49. The four requests for production of documents were similarly addressed by FPL during the discovery phase of this proceeding. Specifically, FPL provided the following:

- Request for Production 1 – FPL provided confidential responsive documents relating to power flow, contingency, and reliability modeling, explained that production cost and economic dispatch modeling is not applicable, and referred EDF to other discovery responses containing responsive information.
- Request for Production 8 – FPL responded that there are no responsive documents.
- Request for Production 12 – FPL provided a confidential responsive document in response to this discovery request.
- Request for Production 13 – FPL identified its transmission planning criteria, transmission planning process, and the AOP expected construction schedule. Further, FPL provided additional data and detail regarding the planning process and evaluation in response to discovery in this docket.

50. EDF identifies no actual deficiency. It merely insists that FPL should have said more, searched more, or phrased its answers differently. The rules do not require endless supplementation to satisfy an opponent dissatisfied with the substance of the answer received.<sup>11</sup>

51. In conferral with EDF, FPL indicated that it has no further information or responsive documents for the responses enumerated above. *See* Appendix C. Nonetheless, EDF

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<sup>11</sup> *See State Rd. Dep't v. Fla. E. Coast Ry. Co.*, 212 So. 2d 315, 317 (Fla. 3d DCA 1968) (“[A]n answer is adequate if it appears to be a full answer to an interrogatory and responsive thereto.”).

continues to seek information through a motion to compel additional information that is not in FPL's possession or in existence. FPL cannot produce documents it does not possess, control, or have. Nor can it be compelled to create narrative explanations or analyses that do not exist.<sup>12</sup>

52. Based on the foregoing, the EDF Motion identifies no legitimate basis to compel further discovery. It seeks to reopen closed discovery, pursue issues outside the scope of this need determination proceeding, and force different answers where FPL has already responded. The discovery responses and objections speak for themselves. To the extent EDF believes FPL's responses do not support FPL's positions on the merits, EDF remains free to test those issues through cross-examination and in its briefing to the Commission. What EDF may not do is expand this case, impose unnecessary burden, and divert the parties and the Commission from the actual issues to be decided.

#### IV. CONCLUSION

53. EDF has not carried its burden to show that the challenged requests seek information relevant to any claim or defense in this docket or that the requests are proportional to the needs of this expedited proceeding. For the rest, FPL answered and produced what exists. EDF's disagreement with those answers is not a basis to compel anything.

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<sup>12</sup> See also *Buckley Dev. Co. v. Tagrin*, 270 So. 2d 433, 434 (Fla. 3d DCA 1972) (“[A] party not in possession or control of documents sought during discovery cannot be held in contempt for failure to produce such documents.”) and *Balzebre v. Anderson*, 294 So. 2d 701, 702 (Fla. 3d DCA 1974) (“[A] party may not be required to produce documents which it does not have and which are not shown to exist.”).

54. For the reasons explained above, the discovery requests that EDF seeks to compel additional information are either sufficient or beyond the scope of this proceeding and unlikely to lead to admissible evidence in this proceeding.

WHEREFORE, FPL respectfully requests that the Commission promptly deny EDF's Motion to Compel to Discovery in its entirety.

Respectfully submitted this 20th day of April 2026,

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## **Appendix A**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Determination of Need  
for Andytown-Oasis Transmission  
Lines in Broward and Miami-Dade Counties,  
by Florida Power & Light Company.

Docket No. 20260020-EI

Served: April 6, 2026

**FLORIDA POWER & LIGHT COMPANY'S  
OBJECTIONS AND RESPONSES TO THE ENVIRONMENTAL DEFENSE FUND,  
INC.'S SECOND SET OF INTERROGATORIES, NOS. 29-32, AND  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 20-23**

Florida Power & Light Company ("FPL") hereby serves the following Objections and Responses to the Environmental Defense Fund, Inc.'s Second Set of Interrogatories, Nos. 29-32, and Second Request for Production of Documents, Nos. 20-23, pursuant to Order No. PSC-2026-0056-PCO-EI.

**I. General Objections**

1. FPL objects to each and every discovery request that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time the response is first made or is later determined to be applicable for any reason. FPL in no way intends to waive any such privilege or protection. The nature of the documents, if any, will be described in a privilege log prepared and provided by FPL.
2. In certain circumstances, FPL may determine, upon investigation and analysis, that information or documents responsive to certain discovery requests to which objections are not otherwise asserted are confidential and proprietary and should be

produced only with provisions in place to protect the confidentiality of the information. By agreeing to provide such information or documents in response to such request, FPL is not waiving its right to insist upon appropriate protection of confidentiality by means of a protective order, a request for confidential classification, a Notice of Intent, and any other process as provided for by Florida Statutes and Commission Rules, or other action to protect the confidential information or documents requested. FPL asserts its right to require such protection of any and all information and documents that may qualify for protection under the Florida Rules of Civil Procedure, Florida Statutes, and other applicable statutes, rules, and legal principles.

3. FPL objects to each discovery request to the extent that it seeks information that is duplicative, not relevant to the subject matter of this docket, and is not reasonably calculated to lead to the discovery of admissible evidence.
4. FPL objects to each and every discovery request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such discovery requests. Any responses provided by FPL will be provided subject to, and without waiver of, the foregoing objection.
5. FPL objects to each and every discovery request to the extent it calls for FPL to prepare information in a particular format or perform calculations or analyses not previously prepared or performed as unduly burdensome and purporting to expand FPL's obligations under applicable law.
6. FPL objects to each and every discovery request to the extent it calls for FPL to conduct legal research or provide a legal conclusion or analysis.

7. FPL objects to providing information to the extent that such information is already in the public record before a public agency and available through normal procedures or is readily accessible through legal search engines.
8. FPL objects to each and every discovery request to the extent it calls for production of documents and/or disclosure of information that is unrelated to FPL's petition for determination of the need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties. Such documents and/or information are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.
9. FPL objects to each and every discovery request that calls for the production of documents and/or disclosure of information from NextEra Energy, Inc. ("NEE") and any other subsidiaries and/or affiliates of NEE that do not deal with transactions or cost allocations between FPL and either NEE or any subsidiaries and/or affiliates. Such documents and/or information do not affect FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties. Therefore, those documents and/or information are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, FPL is the party appearing before the Florida Public Service Commission in this docket. To require any other entities to participate in irrelevant discovery is by its very nature unduly burdensome and overbroad. Subject to, and without waiving, any other objections, FPL will respond to the extent the request pertains to FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties. To the extent any responsive documents contain irrelevant affiliate information as well as

information related to FPL's petition for determination of need for the Andytown-Oasis transmission lines in Miami-Dade and Broward Counties, FPL may redact the irrelevant affiliate information from the responsive documents.

10. Where any discovery request calls for production of documents, FPL objects to any production location other than at FPL's Tallahassee Office located at 134 W. Jefferson Street, Tallahassee, Florida, unless otherwise agreed by the parties.
11. FPL objects to each and every discovery request and any instructions that purport to expand FPL's obligations under applicable law.
12. In addition, FPL reserves its right to count discovery requests and their subparts, as permitted under the applicable rules of procedure, in determining whether it is obligated to respond to additional requests served by any party.
13. FPL expressly reserves and does not waive any and all objections it may have to the admissibility, authenticity, or relevance of the information provided in its responses.

## **II. Specific Objections**

14. FPL objects to detailed information requested in Interrogatory No. 29 regarding every internal or external communication, meeting, or discussion regarding the Andytown-Oasis Project ("AOP) (or its related reliability needs for FPL) with the Florida Reliability Coordinating Council ("FRCC") Biennial Transmission Planning Process ("BTPP"), or any potential regional transmission alternative on the basis that the request is overly burdensome and without reasonable limits, outside of the Commission's jurisdiction, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for

determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.

15. FPL objects to detailed information requested in Interrogatory No. 30 regarding every internal or external communication, meeting, or discussion regarding FPL's strategic posture, voting directives, or policy objectives within the FRCC's regional transmission planning processes over the last five years on the basis that the request is overly burdensome and without reasonable limits, outside of the Commission's jurisdiction, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
16. FPL objects to detailed information requested in Interrogatory No. 31 regarding every internal or external communication, analysis or strategic evaluation by or on behalf of FPL regarding FERC Order 1000 and its mandate to identify Cost Effective or Efficient Regional Transmission Solutions, including the failure to identify or mandate regional transmission solutions, on the basis that the request is overly burdensome and without reasonable limits, outside of the Commission's jurisdiction, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
17. FPL objects to detailed information requested in Interrogatory No. 32 regarding every internal or external communication, analysis, or strategic evaluation regarding FERC Order 1920 on the basis that the request is overly burdensome and without reasonable limits, outside of the Commission's jurisdiction, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding

addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.

18. FPL objects to Request for Production of Documents No. 20 requesting all documents, analyses, and communications identified in, relied upon, or relating to FPL's response to EDF's Second Set of Interrogatories, No. 29, on the basis that this request is overly burdensome and without reasonable limits, outside of the Commission's jurisdiction, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
19. FPL objects to Request for Production of Documents No. 21 requesting all documents, analyses, and communications identified in, relied upon, or relating to FPL's response to EDF's Second Set of Interrogatories, No. 30, on the basis that this request is overly burdensome and without reasonable limits, outside of the Commission's jurisdiction, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
20. FPL objects to Request for Production of Documents No. 22 regarding all internal and external communications, legal memoranda, white papers, consultant reports, and economic analyses relating to FPL's compliance with, interpretation of, or strategic response to FERC Order 1000's regional planning mandates, on the basis that this request is overly burdensome and without reasonable limits, outside of the Commission's jurisdiction, not relevant, and unlikely to lead to the discovery of

admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.

21. FPL objects to Request for Production of Documents No. 23 regarding all internal and external communications, legal memoranda, white papers, consultant reports, and economic analyses relating to FERC Order 1920, on the basis that this request is overly burdensome and without reasonable limits, outside of the Commission's jurisdiction, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.

### **III. Responses**

22. Attached hereto are FPL's non-confidential responses to the Environmental Defense Fund, Inc.'s Second Set of Interrogatories, Nos. 29-32, consistent with the general and specific objections herein.
23. Attached hereto are FPL's non-confidential responses to the Environmental Defense Fund, Inc.'s Second Request for Production of Documents, Nos. 20-23, consistent with the general and specific objections.
24. Confidential documents, if any, will be made available for review subject to FPL's Confidentiality Agreement, a Request for Confidential Classification filed with the Commission, and as agreed by the parties.

Respectfully submitted this 6th day of April 2026,

By: /s/ William P. Cox  
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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 to the following parties of record this 6<sup>th</sup> day of April 2026:

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## **Appendix B**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Determination of Need  
for Andytown-Oasis Transmission  
Lines in Broward and Miami-Dade Counties,  
by Florida Power & Light Company.

Docket No. 20260020-EI

Served: April 3, 2026

**FLORIDA POWER & LIGHT COMPANY'S  
OBJECTIONS AND RESPONSES TO THE ENVIRONMENTAL DEFENSE FUND,  
INC.'S FIRST SET OF INTERROGATORIES, NOS. 1-28, AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 1-19**

Florida Power & Light Company ("FPL") hereby serves the following Objections and Responses to the Environmental Defense Fund, Inc.'s First Set of Interrogatories, Nos. 1-28, and First Request for Production of Documents, Nos. 1-19, pursuant to Order No. PSC-2026-0056-PCO-EI.

**I. General Objections**

1. FPL objects to each and every discovery request that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time the response is first made or is later determined to be applicable for any reason. FPL in no way intends to waive any such privilege or protection. The nature of the documents, if any, will be described in a privilege log prepared and provided by FPL.
2. In certain circumstances, FPL may determine, upon investigation and analysis, that information or documents responsive to certain discovery requests to which objections are not otherwise asserted are confidential and proprietary and should be

produced only with provisions in place to protect the confidentiality of the information. By agreeing to provide such information or documents in response to such request, FPL is not waiving its right to insist upon appropriate protection of confidentiality by means of a protective order, a request for confidential classification, a Notice of Intent, and any other process as provided for by Florida Statutes and Commission Rules, or other action to protect the confidential information or documents requested. FPL asserts its right to require such protection of any and all information and documents that may qualify for protection under the Florida Rules of Civil Procedure, Florida Statutes, and other applicable statutes, rules, and legal principles.

3. FPL objects to each discovery request to the extent that it seeks information that is duplicative, not relevant to the subject matter of this docket, and is not reasonably calculated to lead to the discovery of admissible evidence.
4. FPL objects to each and every discovery request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such discovery requests. Any responses provided by FPL will be provided subject to, and without waiver of, the foregoing objection.
5. FPL objects to each and every discovery request to the extent it calls for FPL to prepare information in a particular format or perform calculations or analyses not previously prepared or performed as unduly burdensome and purporting to expand FPL's obligations under applicable law.
6. FPL objects to each and every discovery request to the extent it calls for FPL to

conduct legal research or provide a legal conclusion or analysis.

7. FPL objects to providing information to the extent that such information is already in the public record before a public agency and available through normal procedures or is readily accessible through legal search engines.
8. FPL objects to each and every discovery request to the extent it calls for production of documents and/or disclosure of information that is unrelated to FPL's petition for determination of the need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties. Such documents and/or information are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.
9. FPL objects to each and every discovery request that calls for the production of documents and/or disclosure of information from NextEra Energy, Inc. ("NEE") and any other subsidiaries and/or affiliates of NEE that do not deal with transactions or cost allocations between FPL and either NEE or any subsidiaries and/or affiliates. Such documents and/or information do not affect FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties. Therefore, those documents and/or information are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, FPL is the party appearing before the Florida Public Service Commission in this docket. To require any other entities to participate in irrelevant discovery is by its very nature unduly burdensome and overbroad. Subject to, and without waiving, any other objections, FPL will respond to the extent the request pertains to FPL's petition for determination of need for the

Andytown-Oasis transmission lines in Broward and Miami-Dade Counties. To the extent any responsive documents contain irrelevant affiliate information as well as information related to FPL's petition for determination of need for the Andytown-Oasis transmission lines in Miami-Dade and Broward Counties, FPL may redact the irrelevant affiliate information from the responsive documents.

10. Where any discovery request calls for production of documents, FPL objects to any production location other than at FPL's Tallahassee Office located at 134 W. Jefferson Street, Tallahassee, Florida, unless otherwise agreed by the parties.
11. FPL objects to each and every discovery request and any instructions that purport to expand FPL's obligations under applicable law.
12. In addition, FPL reserves its right to count discovery requests and their subparts, as permitted under the applicable rules of procedure, in determining whether it is obligated to respond to additional requests served by any party.
13. FPL expressly reserves and does not waive any and all objections it may have to the admissibility, authenticity, or relevance of the information provided in its responses.

## **II. Specific Objections**

14. FPL objects to detailed information requested in Interrogatory No. 3 regarding every FPL transmission project currently operating, under construction, or formally approved through the Florida Reliability Coordinating Council ("FRCC") Biennial Transmission Planning Process ("BTTP") and its review of Cost Effective Regional Transmission Solution ("CEERTS") projects and associated approval cycles on the basis that the request is outside of the Commission's jurisdiction, not relevant, and

unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.

15. FPL objects to Interrogatory No. 4 regarding the FRCC BTTP and its review of CEERTS projects and approval cycles on the basis that the request is outside of the Commission's jurisdiction, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
16. FPL objects to Interrogatory No. 16 regarding all FPL deployment, installation, or piloting of GETs since January 1, 2021, on the basis that the request is overly burdensome, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
17. FPL objects to Interrogatory No. 17 regarding all FPL modeling, evaluation, or consideration of GETs that was not deployed over the last five years, on the basis that the request is overly burdensome, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
18. FPL objects to Interrogatory No. 20 regarding FPL witness Scott Bores' testimony from FPL's 2025 Rate Case and FPL's interregional power transfers across state lines, on the basis that the request is overly burdensome, not relevant, and unlikely

to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.

19. FPL objects to Interrogatory No. 22 regarding FPL's power procured from other balancing authorities within Florida or wheeled through other balancing authorities within Florida, on the basis that the request is overly burdensome, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
20. FPL objects to Interrogatory No. 24 regarding every FPL employee who served in an official capacity within the FRCC within the past five years, on the basis that the request is overly burdensome, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
21. FPL objects to Interrogatory No. 25 regarding identification of every FPL employee who served in an official capacity within the FRCC within the past five years and a direct or supervisory role over the AOP project, on the basis that the request is overly burdensome, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
22. FPL objects to Interrogatory No. 26 regarding governance mechanisms, voting protocols, and consensus requirements used by the FRCC during the BTPP for

CEERTS selections, on the basis that the request is overly burdensome, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties. Notwithstanding FPL's objection to this request, FPL is providing a response to this request.

23. FPL objects to Interrogatory No. 27 regarding monitoring of the condition, life expectancy, and planned replacement schedule of FPL's existing transformation infrastructure, on the basis that the request is not relevant and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
24. FPL objects to Interrogatory No. 28 the analytical process and economic modeling FPL utilizes to develop optimal replacement solution for existing transformation infrastructure, on the basis that the request is not relevant and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
25. FPL objects to Request for Production of Documents No. 3 regarding the FRCC BTPP Order 1000 process, on the basis that the request is not relevant and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
26. FPL objects to Request for Production of Documents No. 4 regarding the FRCC

BTPP Order 1000 process, on the basis that the request is not relevant and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties. Notwithstanding FPL's objection to this request, FPL is providing a response to this request.

27. FPL objects to Request for Production of Documents No. 5 regarding the most recent FRCC BTPP Order 1000 process, on the basis that the request is not relevant and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties. Notwithstanding FPL's objection to this request, FPL is providing a response to this request.
28. FPL objects to Request for Production of Documents No. 6 regarding every FRCC BTPP over the past 10 years, on the basis that the request is overly burdensome, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
29. FPL objects to Request for Production of Documents No. 7 regarding third-party stakeholders for every FRCC BTPP over the past 10 years, on the basis that the request is overly burdensome, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
30. FPL objects to Request for Production of Documents No. 9 regarding FPL real

estate and land for generation and energy storage future development, on the basis that the request is overly burdensome, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.

31. FPL objects to Request for Production of Documents No. 14 regarding FPL witness Scott Bores testimony in FPL's 2025 rate case and FPL's regional power transfer capability across state lines, on the basis that the request is not relevant and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
32. FPL objects to Request for Production of Documents No. 15 regarding importation of wholesale power from outside the State of Florida into FPL's balancing authority, on the basis that the request is not relevant and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
33. FPL objects to Request for Production of Documents No. 16 regarding FPL service at the FRCC and related organization and governance documents, on the basis that the request is overly burdensome, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.

34. FPL objects to Request for Production of Documents No. 17 regarding planned transmission facility replacements or rebuilds over the next ten years, on the basis that the request is not relevant and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
35. FPL objects to Request for Production of Documents No. 18 regarding FPL's engineering solutions for aging or end-of-life transmission infrastructure, on the basis that the request is not relevant and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.
36. FPL objects to Request for Production of Documents No. 19 regarding all exhibits, testimony, or on-the-record comments from FPSC need determination dockets over the past ten (10) years and FRCC proceedings over the past ten (10) years, on the basis that the request is overly burdensome, overly broad, not relevant, and unlikely to lead to the discovery of admissible evidence in this proceeding addressing FPL's petition for determination of need for the Andytown-Oasis transmission lines in Broward and Miami-Dade Counties.

### **III. Responses**

37. Attached hereto are FPL's non-confidential responses to the Environmental Defense Fund, Inc.'s First Set of Interrogatories, Nos. 1-28, consistent with the general and specific objections herein.
38. Attached hereto are FPL's non-confidential responses to the Environmental

Defense Fund, Inc.'s First Request for Production of Documents, Nos. 1-19, consistent with the general and specific objections.

39. Confidential documents, if any, will be made available for review subject to FPL's Confidentiality Agreement, a Request for Confidential Classification filed with the Commission, and as agreed by the parties.

Respectfully submitted this 3rd day of April 2026,

By: /s/ William P. Cox

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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 to the following parties of record this 3rd day of April 2026:

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## **Appendix C**



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April 15, 2026

*Via Electronic Mail*

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**Re: Florida Power & Light – Andytown-Oasis Project Need Determination  
Response to EDF Conferral Letter Regarding Discovery**

Mr. Wright:

Florida Power & Light Company (“FPL”) hereby submits this response to the Conferral Regarding Discovery Responses you sent late on April 13, 2026 (hereinafter, the “Conferral Letter”) on behalf of your client, Environmental Defense Fund, Inc. (“EDF”). EDF’s letter does not identify bona fide discovery deficiencies. Instead, it seeks to reopen closed discovery, pursue information outside the scope of this need determination proceeding, and demand different answers to requests that FPL has already answered. That is not a proper use of conferral and is not a proper basis for any motion to compel.

FPL timely served its objections and responses to EDF’s First Set of Interrogatories and First Request for Production of Documents on April 3, 2026, and timely served its objections and responses to EDF’s Second Set of Interrogatories and Second Request for Production of Documents on April 6, 2026. As you know, this need determination proceeding is governed by an expedited statutory timeline. Notwithstanding that schedule, you waited until April 13, 2026, to send a sweeping letter demanding additional information and documents. Notably, you sent the Conferral Letter after the April 7 deadline for discovery and on the same day as the deadline for providing exhibits pursuant to Order PSC-2026-0056-PCO-EI. That timing is telling. EDF’s Conferral Letter is not a targeted effort to resolve discrete discovery disputes; it is an untimely effort to expand discovery on the eve of hearing.

The Conferral Letter also confirms that EDF is attempting to use this docket to pursue issues that belong elsewhere. As the letter itself makes plain, many of EDF’s demands concern FRCC governance, CEERTS, and the implementation of FERC Orders 1000 and 1920. Those are not the issues in this proceeding. The issue here is FPL’s need determination for the proposed Andytown-Oasis Project (“AOP”), which is driven by undisputed local violations of mandatory NERC Reliability Standards and not by any regional transmission project. Complaints concerning the

enforcement or implementation of regional transmission planning under FERC Orders 1000 and 1920 are outside the scope of this proceeding and beyond the jurisdiction of the Florida Public Service Commission. Those collateral matters are therefore irrelevant and immaterial to the issues before the Commission in this docket. EDF cannot bootstrap broader disputes about FRCC processes or federal transmission planning mandates into this local need determination case through discovery.

FPL has repeatedly explained in testimony and discovery that the AOP is not a regional project, but a local project designed to resolve identified local reliability violations. FPL has further explained that this local reliability need could not be resolved by a regional transmission project because no viable solution to this local reliability need was identified through the FRCC regional transmission planning process. EDF's dissatisfaction with that answer does not make EDF's collateral discovery relevant here. Put simply, EDF is trying to turn this case into a referendum on FRCC governance and FERC regional transmission planning. This proceeding is neither.

The vast majority of EDF's discovery questions are entirely unrelated to the need for AOP, or the alternatives actually considered to resolve that need as clearly explained in FPL's testimonies, exhibits, and discovery responses. Rather, the majority of these discovery questions are related to the current regional transmission planning process under FERC Order 1000 and the future regional transmission planning process under FERC Order 1920, which both you and your client well know has yet to be implemented and approved by FERC. As noted in FPL's objections, complaints and criticisms about the enforcement or implementation of the regional transmission planning process under FERC Order 1000 and 1920 are beyond the scope of this proceeding and the jurisdiction of the Florida Public Service Commission. Thus, by definition, these issues are irrelevant and immaterial to the actual issues to be decided in this need determination proceeding.

Finally, much of EDF's Conferral Letter amounts to a demand for more narrative, more detail, or different phrasing than FPL elected to provide. But discovery rules do not entitle a party to the answer it wishes had been given. FPL's responses speak for themselves. EDF's real complaint is not that FPL failed to respond, but that EDF does not like the responses FPL gave. That is not a basis to compel further discovery – in particular after the discovery deadline has closed. A motion to compel addresses a failure to answer or produce responsive information; it is not a vehicle to force a party to adopt an opponent's characterization, theory, or preferred level of detail. To the extent EDF believes FPL's responses do not support FPL's positions on the merits, EDF's remedy is to test those issues through cross-examination and argument to the Commission, not through an untimely motion to compel.

The timing and breadth of EDF's demands strongly suggest an effort to prolong or complicate this expedited proceeding rather than to resolve legitimate discovery disputes. At a minimum, the Conferral Letter appears designed to impose unnecessary burden and divert party and Commission resources away from the actual issues to be decided. Notwithstanding that apparent misuse of the conferral process, FPL responds below to each point raised in EDF's Conferral Letter.

EDF First Set of Interrogatories No. 2(d):

*Identify any specific data, studies, or determinations generated during the most recent FRCC BTTP that FPL affirmatively incorporated into its alternatives assessment and ultimate selection of the AOP.*

In response, FPL explained that the 2025 FRCC BTPP is based on power-flow models created by the FRCC, which are the same models utilized by FPL in its reliability assessments, the determination of the alternatives, and the ultimate selection of AOP. As explained by FPL's testimony, the AOP is a local project to resolve undisputed, local violations of mandatory NERC Reliability Standards, and the local need and assessment of the AOP was not included in the most recent FRCC BTPP. Rather, they were included in and evaluated as part of FPL's 2025 annual transmission planning assessment, as explained in FPL's testimony. FPL has already provided supporting data for that assessment through exhibits and discovery in this proceeding. No additional data, studies, or determinations from the most recent FRCC BTPP were affirmatively incorporated by FPL, and thus there is no additional responsive information to provide. EDF's demand for still more information about the FRCC BTPP does not identify any deficiency in FPL's response; it merely seeks immaterial and duplicative material.

EDF First Set of Interrogatories No. 4:

*Please list every CEERTS project that (a) has been identified through the FRCC BTPP within since January 1, 2021 that was not selected or constructed by any utility, and (b) that would have impacted FPL's service territory. Include the basic characteristics of each project (e.g., new line vs. upgrade vs. non-wires alternatives, voltage, and power flow considered).*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. Cost Effective or Efficient Regional Transmission Solution (CEERTS) projects are identified through the FRCC Biennial Transmission Planning Process ("BTPP"). As explained above and in FPL's testimony, the AOP is a local project to resolve identified local violations of mandatory NERC Reliability Standards. The local need and assessment for the AOP were not included in the most recent FRCC BTPP. Information about CEERTS is therefore immaterial and irrelevant to the need for the AOP. Indeed, as you well know, EDF's own witness acknowledges that CEERTS projects identified through the FRCC BTPP are not relevant to the AOP because they admit that exactly zero CEERTS projects have been selected through the FRCC process. (See EDF witness Thomas, p. 10.) In any event, FPL further responded that no CEERTS projects were identified. EDF's disagreement with that answer does not render the response deficient. Nor does EDF's broader dissatisfaction with the FRCC process transform CEERTS discovery into a proper subject for this docket.

EDF First Set of Interrogatories No. 5(d):

*Whether FPL evaluated mitigating these specific localized NERC violations using GETs prior to determining that a new 500-kV/230-kV corridor was the only compliant solution.*

In its response, FPL explained that it evaluated potential alternatives, including grid-enhancing technologies ("GETs"), prior to selecting a new 500-kV/230-kV transmission solution, as explained in FPL's response to Staff's Fourth Set of Interrogatories, No. 41. FPL's rebuttal testimony likewise explains that multiple transmission technologies, including GETs, were

considered, but they would not resolve the identified NERC reliability violations. EDF now claims the response is non-responsive because it does not further describe which NERC violations would not be resolved by GETs. That criticism is misplaced. As FPL's direct testimony makes clear, the reliability violations at issue in this proceeding are the NERC Reliability Standards TPL-001-5.1 and NUC-001-4 violations in Miami-Dade County beginning in 2033. EDF's request for still more narrative on that point is duplicative and is not a proper basis for compulsion. Again, EDF's real complaint is not that FPL failed to answer, but that EDF does not like the answer.

EDF First Set of Interrogatories No. 12(a):

*The specific procedural steps taken to identify potential alternatives prior to selecting a preferred solution.*

In its response, FPL explained that it evaluates alternatives to proposed transmission projects through its standard local transmission planning process and identified where the alternatives evaluated for the AOP are described in the Petition. That answers the interrogatory. EDF may prefer a different or more expansive narrative, but a motion to compel is not a mechanism to demand a different answer. The response speaks for itself. To the extent EDF contends that the response is insufficient to carry FPL's burden, that issue is for cross-examination and briefing, not compulsion.

EDF First Set of Interrogatories No. 12(b):

*Whether FPL's internal planning criteria require the evaluation of fundamentally different classes of solutions—specifically including GETs, or regional "right-sizing" upgrades—or whether the alternatives assessment is strictly limited to evaluating alternative geographic routes and configurations for traditional transmission lines.*

FPL responded by directing EDF to the relevant explanation in the rebuttal testimony of FPL witness Miguel Yanes and by explaining that FPL evaluates the effectiveness of GET devices and ATTs when evaluating solutions. FPL also explained that the 230-kV lines being built as part of the AOP will employ ACSS conductors, which FPL considers a type of advanced conductor. In addition, "right-sizing" under FERC Order 1920 concerns a future regional planning framework that has not yet been implemented and is outside the scope of this proceeding. EDF's disagreement with the response does not make it incomplete. The response speaks for itself, and any merits-based criticism belongs in cross-examination and briefing.

EDF First Set of Interrogatories No. 13(b):

*Identify any and all GETs that FPL modeled, evaluated, or considered as a potential alternative to the AOP to ensure the delivery of "abundant, low-cost electrical energy.*

FPL explained that it considered the applicability of GETs as part of its alternatives assessment. However, as explained in the rebuttal testimony of FPL witness Miguel Yanes and FPL's response to Staff's Fourth Set of Interrogatories, No. 41, GETs are not capable of fully mitigating the identified thermal and voltage violations in compliance with applicable NERC reliability standards and, therefore, were not advanced as alternatives to the AOP. FPL also noted that the two 230-kV lines proposed as part of the AOP will utilize ACSS conductors, a specific type of advanced conductor. As clearly explained, no GETs would resolve the need for the AOP and, therefore, no GETs were considered and modeled as a viable alternative. That is a complete response. Although EDF may dislike this response, EDF cannot transform disagreement with FPL's conclusion into a discovery deficiency.

EDF First Set of Interrogatories No. 14(a):

*Please identify and describe in detail any and all alternative transmission solutions, generation alternatives, or grid configurations that FPL evaluated, modeled, or considered internally to address the constraints driving the AOP, but which were ultimately excluded from the formal alternatives assessment presented in the Petition. In your response, please explicitly group these unlisted alternatives into the following categories, indicating whether any such options were considered: a. Non-Wires Alternatives (NWAs): Including, but not limited to, utility-scale battery energy storage systems (BESS), targeted energy efficiency, or demand response programs located within the South Florida load pocket.*

FPL explained that it did not identify any NWAs, including utility-scale battery storage, targeted energy efficiency, or demand response programs, that could resolve the identified transmission reliability violations addressed by the proposed AOP. Accordingly, those non-wire alternatives were not advanced as alternatives to the AOP. FPL also directed EDF to FPL's responses to Staff's First Set of Interrogatories, Nos. 9 and 11. That is a complete response to the request. EDF's dissatisfaction with the answer does not justify compulsion. To the extent EDF believes FPL should have considered additional alternatives, that is an issue for cross-examination and argument, not a discovery issue.

EDF First Set of Interrogatories No. 15:

*For each unlisted alternative identified in response to Interrogatory No. 14 that FPL considered but did not include in the Petition, please provide: a. The specific date(s) or timeframe during which the alternative was evaluated; b. The name of the internal FPL department, committee, or third-party consultant responsible for evaluating the alternative; c. A detailed explanation of the specific engineering, reliability, or economic criteria that caused FPL to reject the alternative prior to filing the Petition; d. An explanation of whether the alternative was rejected specifically because it failed to satisfy the statutory need criterion requirement of providing "abundant, low-cost electrical energy to assure the economic well-being of the residents" of Florida, and if so, the quantitative data relied upon to make that determination.*

This interrogatory seeks information about alternatives that were identified in FPL's response to EDF First Set of Interrogatories No. 14, which in turn asks FPL to identify alternative transmission solutions, generation alternatives, or grid configurations that FPL evaluated, modeled, or considered internally to address the need for the AOP. FPL confirms that "recorded" means documented by FPL. As FPL explained in its response to Interrogatory No. 14, only those alternatives capable of fully resolving the identified local reliability need were advanced into the formal alternatives assessment, and those alternatives were presented in the Petition filed on March 11, 2026, in Docket No. 20260020-EI. FPL further explained that other alternative transmission technologies, including NWAs, ATTs, GETs, HVDC, and "right-sized" solutions, were not capable of resolving the need for the AOP and therefore were not considered viable alternatives. A potential solution that does not resolve the problem is not a true alternative – it is a detour. Accordingly, other than the alternatives presented in the Petition, the answer to Interrogatory No. 14 is "none," and there is no further information to provide in response to Interrogatory No. 15. Moreover, EDF's demand for further information and documents on this point is, in substance, an attempt to serve additional discovery after the deadline has closed.

EDF First Set of Interrogatories No. 20:

*During FPL's 2025 base rate case, Vice President of Finance Scott Bores testified that "FPL's ability to supply power purchased from outside of Florida if there is a significant need or disruption due to extreme weather events is more constrained than utilities with more access to regional options." With respect to this stated constraint on interregional power transfers across the Florida state line, please provide the following data and operational details: a. Quantify FPL's current total interregional physical transfer capability (in Megawatts) to import power across the Florida state line; b. Of the total interregional transfer capability identified in subpart (a), quantify how much is currently secured under firm, long-term contracts versus non-firm or spot-market availability; c. Provide the total volume of electrical energy (in MWh) that FPL imported from outside the State of Florida for each year from 2021 through 2025; d. Provide the average cost (\$/MWh) and the peak cost (\$/MWh) of the interregional power imported across the Florida state line for each year from 2021 through 2025, specifically noting the costs incurred during extreme weather events (e.g., Winter Storm Elliott, hurricanes).*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. This discovery request seeks detailed information about statements made in an entirely unrelated docket that had nothing to do with the need for the AOP project. The time and place to "test" these statements were in FPL's 2025 rate case, not here in an unrelated proceeding. Further, the data and details on interregional power transfers across the Florida state line are immaterial and irrelevant here because, as explained above and repeatedly in FPL's testimony and discovery response, the AOP is needed to resolve undisputed local violations of the mandatory NERC Reliability Standards. The data requested by this discovery request is sought to further advance EDF's advocacy at FRCC and FERC regarding the enforcement and implementation of the regional transmission planning process under FERC Orders 1000 and 1920 – not to address the undisputed local need for the AOP project in this docket.

EDF First Set of Interrogatories No. 22:

*Given the severe constraints on interregional power transfers identified by Mr. Bores, please describe in detail what specific actions FPL is taking to resolve these macro-level barriers to ensure the delivery of "abundant, low-cost electrical energy to assure the economic well-being of the residents" of Florida. Specifically: a. Identify any capital investments, joint-utility partnerships, or formal transmission planning initiatives FPL has undertaken within the last five (5) years to physically expand interregional transfer capacity across the Florida state line; b. State whether the expansion of interregional transmission ties to neighboring out-of-state balancing authorities is currently included in FPL's Ten-Year Site Plan or any internal long-term transmission expansion plans; c. If FPL currently has no active plans or proposed projects to increase interregional transfer capacity into Florida across the Florida state line, please explain the engineering and economic justification for prioritizing localized, intra-state projects (such as the AOP) over resolving the macro-level state-line constraints identified by FPL's financial executives.*

For the same reasons explained in FPL's response above under the EDF First Set of Interrogatories No. 20, FPL objected to this discovery request on the basis of, among other things, it is irrelevant and immaterial to the need determination at issue in this proceeding. EDF's disagreement with those objections does not make these collateral subjects discoverable here.

EDF First Set of Interrogatories No. 24:

*Please identify every FPL employee, officer, or external consultant acting on FPL's behalf who currently serves, or has served at any point within the past five (5) years, in any official capacity within the FRCC. This request specifically includes, but is not limited to, membership on the Board of Directors, the Planning Committee, the Transmission Working Group, or any committee, subcommittee, or task force involved in the BTPP. For each individual identified, please provide: a. Their current functional job title and department within FPL. b. Their specific role, title, and committee assignment(s) within the FRCC. c. A detailed description of their responsibilities and duties within their FRCC role. d. Whether the individual possesses voting rights within their respective FRCC committee or working group.*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. As explained above and throughout FPL's testimony and discovery responses, the AOP is a local project to resolve identified local reliability violations, and that local reliability need could not be resolved by a regional transmission project because no viable solution to the local need was identified through the most recent FRCC regional planning process. EDF's dissatisfaction with FRCC processes does not confer jurisdiction on the Commission over those matters or make them relevant to this proceeding.

EDF First Set of Interrogatories No. 25:

*For each individual identified in response to Interrogatory No. 25, please explicitly state whether that individual had any direct or supervisory role in the internal identification, load-flow modeling, alternatives assessment, or management approval of the localized AOP proposed in this docket.*

For the same reasons explained above in FPL's response under the EDF First Set of Interrogatories No. 24, FPL objected to this discovery request on the basis of, among other things, it is irrelevant and immaterial.

EDF First Set of Interrogatories No. 26:

*Please describe in detail the governance mechanisms, voting protocols, and consensus requirements utilized by the FRCC during the BTPP to evaluate localized utility plans and determine whether a CEERTS should be selected. Specifically, please address: a. Does FPL, through its representatives on FRCC committees, hold veto power or the ability to block the selection of a CEERTS that would replace or modify an FPL-proposed localized transmission project? b. Please describe any internal FPL protocols, ethical guidelines, or operational "firewalls" in place to ensure that FPL employees serving on FRCC planning committees evaluate regional transmission alternatives independently and objectively, rather than strictly advancing FPL's internal capital expenditure plans.*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. The governance mechanisms, voting protocols, and consensus requirements utilized by the FRCC to determine if CEERTS projects should be selected is immaterial and irrelevant to the need for the AOP as explained above in FPL's response under EDF First Set of Interrogatories No. 4. Notwithstanding the foregoing, and without conceding relevance, FPL responded it does not hold veto power and does not have the ability, through its representatives on FRCC committees, to unilaterally block the selection of a CEERTS projects that would replace or modify an FPL-proposed localized transmission project. FPL also explained that employees participating in FRCC planning committees are required to comply with FPL's Code of Conduct and FRCC antitrust compliance guidelines. EDF's disagreement with that response does not make it incomplete. The response speaks for itself, and any assertion that it does not satisfy FPL's burden is an issue for cross-examination and briefing.

EDF First Set of Interrogatories No. 27:

*Identify and describe in detail the databases, tracking systems, asset management programs, and long-term planning documents utilized by FPL to monitor the condition, life expectancy, and planned replacement schedule of its existing transmission infrastructure. In your response, please explicitly detail: a. The specific engineering criteria, condition assessments, or operational metrics (e.g., chronological age, physical deterioration, failure rates, thermal limits) FPL utilizes to flag a transmission facility for targeted replacement or rebuild. b. The*

*timeframe or planning horizon over which FPL projects its infrastructure replacement schedules (e.g., 5-year, 10-year, or 20-year capital plans). c. The specific internal department(s) or committee(s) responsible for maintaining this data and authorizing the replacement schedules.*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. It is undisputed that the AOP project is needed to resolve local violations of the mandatory NERC Reliability Standards due to load growth in Miami-Dade County. The need for the AOP is unrelated to condition, life expectancy, and planned replacement schedule of FPL's existing transmission infrastructure.

EDF First Set of Interrogatories No. 28:

*When an existing transmission facility is identified as aging, deteriorating, or requiring replacement, describe in detail the analytical process and economic modeling FPL utilizes to determine the optimal replacement solution. Specifically, please address: a. Whether FPL's internal planning criteria permit automatic "like-for-like" replacements, or whether a holistic needs assessment is required for each aging asset. b. Whether FPL requires planners to affirmatively consider, model, and evaluate and GETs, including advanced conductors, as alternatives to defer the capital cost of a full infrastructure rebuild. c. If FPL does not routinely evaluate GETs as alternatives to replacing aging infrastructure, please explain how FPL ensures that its replacement capital expenditures satisfy the statutory requirement to deliver "abundant, low-cost electrical energy."*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. It is undisputed that the AOP project is needed to resolve local violations of the mandatory NERC Reliability Standards due to load growth in Miami-Dade County. The need for the AOP is unrelated to replacement of FPL's existing transmission infrastructure.

EDF Second Set of Interrogatories No. 29:

*Identify every communication, meeting, or discussion—whether internal to FPL or external—in which the proposed Andytown-Oasis Project (AOP), or the reliability needs that FPL has identified in support of the AOP project, was discussed in relation to the Florida Reliability Coordinating Council (FRCC), the Biennial Transmission Planning Process (BTPP), or any potential regional transmission alternative. In your response, explicitly identify: a. Any communications between FPL personnel and FRCC staff, committee members, or external consultants regarding whether the AOP (or the constraints it resolves) should be modeled, evaluated, or designated as a regional project. b. Any communications between FPL personnel and representatives of other Florida electric utilities regarding the AOP and its potential impacts on the regional grid. c. Any internal communications or strategy discussions among FPL management, planners, or regulatory staff regarding how to present, or whether to present, the AOP to the FRCC.*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. As explained above, the AOP is a local project to address local need, and was not identified through the FRCC BTPP. Thus, there are no such documents of information because AOP was not part of the FRCC BTPP process to address regional transmission solutions to regional needs. This request seeks to litigate EDF's broader criticisms of FRCC governance and FERC regional transmission planning mandates, not the local reliability need for the AOP. That is not a proper subject for discovery in this need determination docket.

EDF Second Set of Interrogatories No. 30:

*Identify every communication, meeting, or discussion—whether internal or external—regarding FPL's strategic posture, voting directives, or policy objectives within the FRCC's regional transmission planning processes over the last five (5) years. In your response, explicitly identify: a. Any internal FPL directives, talking points, or guidelines provided to FPL employees serving on FRCC committees regarding how to evaluate, vote on, or respond to proposed regional transmission projects. b. Any communications between FPL and other Florida utilities coordinating votes, policy positions, or responses to stakeholder proposals within the FRCC.*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. The information sought in this discovery request is general information about the FRCC's regional transmission planning process and unrelated to the need for the AOP project. As explained above, the AOP is a local project to address local need, and was not identified through the FRCC BTPP. The data requested by this discovery request is sought to further advance EDF's advocacy at FRCC and FERC regarding the enforcement and implementation of the regional transmission planning process under FERC Orders 1000 and 1920 – not to address the undisputed local need for the AOP project in this docket.

EDF Second Set of Interrogatories No. 31:

*Identify every internal or external communication, analysis, or strategic evaluation conducted by or on behalf of FPL regarding FERC Order 1000 and its mandate to identify Cost Effective or Efficient Regional Transmission Solutions (CEERTS). This includes, but is not limited to, communications explaining, questioning, or analyzing why the FRCC BTPP has consistently failed to identify or mandate regional transmission solutions in lieu of localized utility projects within FPL's service territory.*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. The information sought in this discovery request is general information about the FRCC's regional transmission planning process and its evaluation of CEERTS projects. It is unrelated to the need for the AOP project. As explained above, the AOP is a local project to address local need, and was not identified through the FRCC BTPP process. Further, FRCC's evaluation of CEERTS projects is immaterial and irrelevant to the need for the AOP as explained above under EDF First

Set of Interrogatories No. 4. The data requested by this discovery request is sought to further advance EDF's advocacy at FRCC and FERC regarding the enforcement and implementation of the regional transmission planning process under FERC Orders 1000 and 1920 – not to address the undisputed local need for the AOP project in this docket.

EDF Second Set of Interrogatories No. 32:

*Identify every internal or external communication, analysis, or strategic evaluation conducted by or on behalf of FPL regarding FERC Order 1920. In your response, explicitly identify: a. Any communications, internal memoranda, or consultant reports evaluating how Order 1920's mandate for long-term regional planning and "right-sizing" of local projects will impact FPL's capital expenditure plans or local transmission projects. b. Any communications between FPL and FRCC staff, or between FPL and other Florida utilities, regarding the strategy for drafting the FRCC's compliance filing for Order 1920. c. Any internal communications discussing whether the timing, scope, or necessity of the AOP is influenced by the impending implementation of Order 1920.*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. The enforcement or implementation of the regional transmission planning process under FERC Order 1920 are beyond the scope of this proceeding and the jurisdiction of the Florida Public Service Commission. Thus, by definition, these issues are irrelevant and immaterial to the actual issues to be decided in this need determination proceeding. Further, as you and your client well know, the future regional transmission planning process under FERC Order 1920 has yet to be implemented and approved by FERC. The data requested by this discovery request is sought to further advance EDF's advocacy at FRCC and FERC regarding the enforcement and implementation of the yet to be determined and approved regional transmission planning process under FERC Order 1920 – not to address the undisputed local need for the AOP project in this docket.

EDF First Request for Production of Documents No. 1:

*Please produce all data, input files, output files, workpapers, and underlying assumptions utilized in any and all modeling performed by or on behalf of FPL in the planning, development, alternatives assessment, and justification of the proposed AOP. For clarity, the scope of this production request explicitly includes, but is not limited to: a. Power flow, contingency, and reliability modeling (e.g., PSS/E, PSLF) explicitly including the "Base Case" models, "Change Case" models, and specific contingency outputs demonstrating the NERC TPL-001-5.1 violations relied upon to justify the AOP. b. Production cost and economic dispatch modeling (e.g., PROMOD, PLEXOS) utilized to calculate system fuel savings, renewable curtailment impacts, economic benefits, and the dispatch of specific generation facilities projected to supply power across the AOP during Summer and Winter peaks in each of the first five years following the year in which the AOP is completed. c. Any specific sensitivity models run by FPL (e.g., high/low load*

*growth, extreme weather, high/low natural gas prices). d. Load forecasting and spatial load allocation models. e. All spreadsheets and quantitative analyses used to calculate project capital costs, revenue requirements, or ratepayer impacts.*

FPL provided confidential responsive documents relating to power flow, contingency, and reliability modeling, explained that production cost and economic dispatch modeling is not applicable, and referred EDF to other discovery responses containing responsive information. EDF may prefer that the information be produced in a different form, but the information was produced in the form in which it exists. That is not a discovery deficiency. The response speaks for itself, and any contention that it does not satisfy FPL's burden is a merits issue for cross-examination and briefing.

EDF First Request for Production of Documents No. 5(d):

*Internal documents generated by FPL employees serving in roles at FRCC related to most recent BTPP and FERC Order 1920 compliance development process.*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. The enforcement or implementation of the future regional transmission planning process under FERC Order 1920 are beyond the scope of this proceeding and the jurisdiction of the Florida Public Service Commission. Thus, by definition, these issues are irrelevant and immaterial to the actual issues to be decided in this need determination proceeding. Further, as you and your client well know, the future regional transmission planning process under FERC Order 1920 has yet to be implemented and approved by FERC. The data requested by this discovery request is sought to further advance EDF's advocacy at FRCC and FERC regarding the enforcement and implementation of the regional transmission planning process under FERC Order 1920 – not to address the undisputed local need for the AOP project in this docket. Moreover, FPL did, in fact, respond that it has no responsive documents – so there is nothing to produce. Although not needed to respond to this discovery request, FPL also noted that any such documents are subject to confidentiality agreements with third parties. Finally, EDF's demand for further information and documents on this point is, in substance, an attempt to serve additional discovery after the deadline has closed.

EDF First Request for Production of Documents No. 6:

*Please produce the complete final study reports, appendices, and all associated native electronic modeling files for every FRCC BTPP conducted over the past ten (10) years (i.e., planning cycles from 2016 through the present). For clarity, this production request explicitly includes, but is not limited to: a. The final, approved BTPP reports detailing the system needs and approved regional or local transmission plans. b. All "Base Case" and "Change Case" power flow models (in native, executable formats such as PSS/E or PSLF) utilized to evaluate Florida's transmission constraints during each respective BTPP cycle. c. All economic dispatch models or production cost simulations utilized during each respective*

*cycle to evaluate the economic impact of transmission congestion or the benefits of proposed solutions.*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. As explained above and repeatedly in FPL's testimony and discovery responses, the FRCC BTTP process under FERC Order 1000 is not relevant or material to the undisputed need for the AOP because it is a local project to resolve a local violation of the mandatory NERC Reliability Standards.

EDF First Request for Production of Documents No. 8:

*Please produce all internal memoranda, email correspondence, presentation decks, engineering models, and cost-benefit analyses generated within the last 36 months that discuss, evaluate, compare, or dismiss any alternative to the AOP that was not formally presented as an alternative in the Petition. This explicitly includes documents evaluating the cost and efficacy of the AOP against Non-Wires Alternatives (NWAs) such as battery storage, Advanced Transmission Technologies (ATTs), or Grid-Enhancing Technologies (GETs).*

FPL responded that there are no responsive documents. EDF may be unhappy that no such documents exist, but FPL cannot produce documents that do not exist. As explained above, a potential solution that does not resolve the problem is not a true alternative solution and, therefore, not properly considered and evaluated as a viable alternative to the AOP. Moreover, EDF's demand for further information and documents on this point is, in substance, an attempt to serve additional discovery after the deadline has closed.

EDF First Request for Production of Documents No. 12:

*Please produce all internal load forecasting models, load-flow studies, and regional resource adequacy assessments that calculate or project the generation deficit, import requirements, and transmission transfer limits for the combined Miami-Dade and Broward County geographic region for the period of 2026 through 2036.*

FPL provided a confidential responsive document in response to this discovery request. EDF may prefer that the requested information be assembled or characterized differently, but that is not the standard. FPL responded and produced responsive material in the form in which it exists. The responses speak for themselves, and any argument that they are insufficient on the merits belongs in cross-examination and briefing.

EDF First Request for Production of Documents No. 13:

*Please produce all internal manuals, guidelines, planning criteria documents, standard operating procedures, and flowcharts utilized by FPL transmission planners that govern or prescribe how FPL considers and evaluates alternatives to*

*proposed transmission projects are identified, modeled, and evaluated for the purposes of local planning and Need Determinations.*

In its response, FPL identified its transmission planning criteria, transmission planning process, and the AOP expected construction schedule. Further, FPL provided additional data and detail regarding the planning process and evaluation in response to discovery in this docket. Although EDF may prefer that the requested information be assembled or characterized differently, that is not the standard. FPL responded and produced responsive material in the form in which it exists. The responses speak for themselves, and any argument that they are insufficient on the merits belongs in cross-examination and briefing.

EDF First Request for Production of Documents No. 14:

*Please produce all data, load-flow studies, economic analyses, or internal memoranda that FPL management or Scott Bores relied upon in his testimony in Florida PSC Docket No. 20250011-EI (the 2025 FPL rate case) to conclude that FPL's ability to supply power from outside of Florida is "more constrained than utilities with more access to regional options."*

This discovery request is seeking documents and data related to EDF First Set of Interrogatories Nos. 20 and 22. For the same reasons explained above in FPL's response under EDF First Set of Interrogatories Nos. 20 and 22, FPL objected to this discovery request on the basis of, among other things, it is irrelevant and immaterial. EDF's attempt to pursue those collateral subjects through discovery in this docket is improper. These requests do not bear on whether the AOP is needed to address the identified local reliability violations.

EDF First Request for Production of Documents No. 15:

*Please produce all current interregional power purchase agreements, firm transmission service agreements, and pricing term sheets governing the importation of wholesale power from outside the State of Florida into the FPL balancing authority.*

This discovery request is seeking documents and data related to EDF First Set of Interrogatories Nos. 20 and 22. For the same reasons explained in FPL's response under EDF First Set of Interrogatories Nos. 20 and 22, FPL objected to this discovery request on the basis of, among other things, it is irrelevant and immaterial. EDF's attempt to pursue those collateral subjects through discovery in this docket is improper. These requests do not bear on whether the AOP is needed to address the identified local reliability violations.

EDF First Request for Production of Documents No. 16:

*Please produce all current organizational charts, committee rosters, charters, and bylaws for the FRCC committees and working groups on which FPL employees*

*currently serve, specifically including any documents governing member voting rights and dispute resolution within the BTTP.*

As repeatedly explained above, the need for the AOP and the AOP were not identified or evaluated as part of the FRCC BTTP process and, therefore, FPL objected to this discovery request on the basis of, among other things, it is irrelevant and immaterial. The data requested by this discovery request is sought to further advance EDF's advocacy at FRCC and FERC regarding the enforcement and implementation of the regional transmission planning processes under FERC Orders 1000 and 1920 – not to address the undisputed local need for the AOP project in this docket.

EDF First Request for Production of Documents No. 17:

*Please produce the most current version of any capital replacement schedules, "aging infrastructure" watchlists, or asset condition assessment reports that detail planned transmission facility replacements or rebuilds over the next ten (10) years, specifically including any such facilities located within or serving the combined Miami-Dade and Broward County region.*

FPL objected to this request on the basis of, among other things, it is irrelevant and immaterial. It is undisputed that the AOP project is needed to resolve local violations of the mandatory NERC Reliability Standards due to load growth in Miami-Dade County. The need for the AOP is unrelated to condition, life expectancy, and planned replacement schedule of FPL's existing transmission infrastructure.

EDF First Request for Production of Documents No. 18:

*Please produce all internal manuals, engineering guidelines, and standard operating procedures documents in any format that govern or prescribe how FPL evaluates, prioritizes, and selects engineering solutions for aging or end-of-life transmission infrastructure.*

For the same responses explained in FPL's response under EDF First Request for Production of Documents No. 17, FPL objected to this discovery request on the basis of, among other things, it is irrelevant and immaterial.

EDF Second Request for Production of Documents No. 20:

*Produce all documents, analyses, and communications identified in, relied upon, or relating to your response to Interrogatory No. 29. This request explicitly encompasses all internal emails, instant messages (e.g., Microsoft Teams, Slack), memoranda, and handwritten notes, as well as all external correspondence with FRCC staff, other utilities, and third-party consultants regarding the interplay between the AOP and the FRCC planning process.*

FPL objected to both EDF First Set of Interrogatories No. 29 and this discovery request on the basis of, among other things, it is irrelevant and immaterial. As explained above, the AOP is a local project to address local need, and was not identified through the FRCC BTTP process. Thus, there are no such documents or information identified in EDF First Set of Interrogatories No. 29. Accordingly, there are not such documents to produce in response to this document request. Further, the data requested by this discovery request is sought to further advance EDF's advocacy at FRCC and FERC regarding the enforcement and implementation of the regional transmission planning process under FERC Orders 1000 and 1920 – not to address the undisputed local need for the AOP project in this docket.

EDF Second Request for Production of Documents No. 21:

*Produce all documents, analyses, and communications identified in, relied upon, or relating to your response to Interrogatory No. 30. This includes all internal strategy documents, voting guides, and coordination emails between FPL and other FRCC member utilities designed to establish consensus, align voting, or dictate outcomes within the FRCC Biennial Transmission Planning Process.*

FPL objected to both EDF First Set of Interrogatories No. 30 and this discovery request on the basis of, among other things, they are irrelevant and immaterial. As explained above, the AOP is a local project to address local need, and was not identified through the FRCC BTTP process, and FRCC's evaluation of CEERTS projects is immaterial and irrelevant to the need for the AOP as explained above under EDF First Set of Interrogatories No. 4. Thus, there are no such documents or information identified in EDF First Set of Interrogatories No. 30. Accordingly, there are no such documents to produce in response to this document request. Further, the data requested by this discovery request is sought to further advance EDF's advocacy at FRCC and FERC regarding the enforcement and implementation of the regional transmission planning process under FERC Orders 1000 and 1920 – not to address the undisputed local need for the AOP project in this docket.

EDF Second Request for Production of Documents No. 22:

*Produce all internal and external communications, legal memoranda, white papers, consultant reports, and economic analyses relating to FPL's compliance with, interpretation of, or strategic response to FERC Order 1000's regional planning mandates. This explicitly includes any internal correspondence discussing the absence of CEERTS projects within the Florida peninsula.*

For the same reasons FPL explained under EDF Second Set of Interrogatories No. 31, FPL objected to this discovery request on the basis of, among other things, it is irrelevant and immaterial.

EDF Second Request for Production of Documents No. 23:

*Produce all internal and external communications, legal memoranda, white papers, consultant reports, and economic analyses relating to FERC Order 1920.*

*This request specifically demands the production of: a. All internal emails and strategy documents discussing how the Order 1920 mandates for "right-sizing" and advanced technology evaluations will affect FPL's local transmission planning and future Need Determinations. b. All communications, draft redlines, and meeting notes between FPL, FRCC staff, and other Florida utilities regarding the development of the FRCC's regional compliance strategy for Order 1920. c. All internal correspondence or analyses discussing whether to accelerate, modify, or advance localized projects (including the AOP) prior to the full implementation of the Order 1920 regional planning framework.*

For the same reasons FPL explained under EDF Second Set of Interrogatories No. 32, FPL objected to this discovery request on the basis of, among other things, it is irrelevant and immaterial.

In sum, EDF's Conferral Letter identifies no legitimate basis to compel further discovery. It seeks to reopen closed discovery, pursue issues outside the scope of this need determination proceeding, and force different answers where FPL has already responded. The discovery responses speak for themselves. To the extent EDF believes FPL's responses do not support FPL's positions on the merits, EDF remains free to test those issues through cross-examination and in its briefing to the Commission. What EDF may not do is misuse the conferral process to expand this case, impose unnecessary burden, and divert the parties and the Commission from the actual issues to be decided. FPL therefore rejects EDF's demands for supplemental responses and production.

Regards,

/s/ Christopher T. Wright

Christopher T. Wright

Fla. Auth. House Counsel No. 1007055

Enclosures

cc: Parties of Record in Docket No. 20260020-EI.

## **Appendix D**

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Set of Interrogatories**  
**Interrogatory No. 2**  
**Page 1 of 1**

QUESTION:

Describe in detail the procedural and analytical interplay and relationships between FPL's internal, local transmission planning process and its participation in regional planning processes, specifically including the Florida Reliability Coordinating Council's (FRCC) Biennial Transmission Planning Process (BTPP). In your response, please:

- a. State whether FPL submits its identified local system needs and constraints for comprehensive regional evaluation to determine if a right-sized, regional alternative could resolve the constraint more cost-effectively. If the answer is affirmative, explain how the evaluation is made.
- b. Identify any and all system needs, economic congestion, or transmission constraints that FPL considered or modeled during the development and evaluation of the AOP, aside from the specific NERC reliability violations listed in the petition. If no other constraints were considered, please explicitly state so.
- c. State whether FPL's modeling for the AOP incorporated, addressed, or attempted to resolve any of the broader, region-wide transmission constraints identified in the most recent FRCC BTPP, or in any other relevant regional transmission studies. If the answer is affirmative, describe precisely how those regional constraints were modeled and evaluated as part of the solution, and identify any broader, region-wide transmission constraints that were addressed in FPL's modeling.
- d. Identify any specific data, studies, or determinations generated during the most recent FRCC BTPP that FPL affirmatively incorporated into its alternatives assessment and ultimate selection of the AOP.

RESPONSE:

- a. - b. Please refer to Section IV of the Direct Testimony of FPL witness Yanes filed on March 11, 2026 in Docket No. 20260020-EI.
- c. Please refer to FPL's response to Staff's Third Set of Interrogatories, No. 37, for a description of the FRCC regional transmission planning process. The Andytown-Oasis Transmission Lines Project ("AOP") was not identified through the regional planning process and is not a regional project. Rather, it was identified as a local reliability need, as described in Section III of the Rebuttal Testimony of FPL witness Yanes filed on March 30, 2026 in this same docket.
- d. The 2025 FRCC BTPP is based on power-flow models created by the FRCC, the same models utilized by FPL in its reliability assessments, the determination of the alternatives and the ultimate selection of AOP.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Set of Interrogatories**  
**Interrogatory No. 20**  
**Page 1 of 1**

QUESTION:

During FPL's 2025 base rate case, Vice President of Finance Scott Bores testified that "FPL's ability to supply power purchased from outside of Florida if there is a significant need or disruption due to extreme weather events is more constrained than utilities with more access to regional options." With respect to this stated constraint on interregional power transfers across the Florida state line, please provide the following data and operational details:

- a. Quantify FPL's current total interregional physical transfer capability (in Megawatts) to import power across the Florida state line.
- b. Of the total interregional transfer capability identified in subpart (a), quantify how much is currently secured under firm, long-term contracts versus non-firm or spot-market availability.
- c. Provide the total volume of electrical energy (in MWh) that FPL imported from outside the State of Florida for each year from 2021 through 2025.
- d. Provide the average cost (\$/MWh) and the peak cost (\$/MWh) of the interregional power imported across the Florida state line for each year from 2021 through 2025, specifically noting the costs incurred during extreme weather events (e.g., Winter Storm Elliott, hurricanes).

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Set of Interrogatories**  
**Interrogatory No. 22**  
**Page 1 of 1**

QUESTION:

With respect to all power procured from other balancing authorities within Florida, or wheeled through other balancing authorities within Florida, please provide the following data and operational details:

- a. Provide the total volume of electrical energy (in MWh) that FPL imported from other Florida balancing authorities for each year from 2021 through 2025.
- b. Provide the average cost (\$/MWh) and the peak cost (\$/MWh) of the power imported from other Florida balancing authorities for each year from 2021 through 2025, specifically noting the costs incurred during extreme weather events (e.g., Winter Storm Elliott, hurricanes).
- c. Provide the wheeling rates paid by FPL for all power wheeled through other Florida balancing authorities for each year from 2021 through 2025, as well as the total volume of electrical energy (in MWh) wheeled under each rate.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Set of Interrogatories**  
**Interrogatory No. 24**  
**Page 1 of 1**

QUESTION:

Please identify every FPL employee, officer, or external consultant acting on FPL's behalf who currently serves, or has served at any point within the past five (5) years, in any official capacity within the FRCC. This request specifically includes, but is not limited to, membership on the Board of Directors, the Planning Committee, the Transmission Working Group, or any committee, subcommittee, or task force involved in the BTPP. For each individual identified, please provide:

- a. Their current functional job title and department within FPL.
- b. Their specific role, title, and committee assignment(s) within the FRCC.
- c. A detailed description of their responsibilities and duties within their FRCC role.
- d. Whether the individual possesses voting rights within their respective FRCC committee or working group.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Set of Interrogatories**  
**Interrogatory No. 25**  
**Page 1 of 1**

QUESTION:

For each individual identified in response to Interrogatory No. 25, please explicitly state whether that individual had any direct or supervisory role in the internal identification, load-flow modeling, alternatives assessment, or management approval of the localized AOP proposed in this docket

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Set of Interrogatories**  
**Interrogatory No. 26**  
**Page 1 of 1**

QUESTION:

Please describe in detail the governance mechanisms, voting protocols, and consensus requirements utilized by the FRCC during the BTPP to evaluate localized utility plans and determine whether a CEERTS should be selected. Specifically, please address:

- a. Does FPL, through its representatives on FRCC committees, hold veto power or the ability to block the selection of a CEERTS that would replace or modify an FPL-proposed localized transmission project?
- b. Please describe any internal FPL protocols, ethical guidelines, or operational "firewalls" in place to ensure that FPL employees serving on FRCC planning committees evaluate regional transmission alternatives independently and objectively, rather than strictly advancing FPL's internal capital expenditure plans.

RESPONSE:

See FPL's objections served contemporaneously herewith. Subject thereto, and without waiver of any objection, FPL responds as follows:

- a. No. FPL does not hold veto power and does not have the ability, through its representatives on FRCC committees, to unilaterally block the selection of a CEERTS that would replace or modify an FPL-proposed localized transmission project.
- b. FPL employees participating in FRCC planning committees are required to comply with FPL's Code of Conduct and FRCC antitrust compliance guidelines.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Set of Interrogatories**  
**Interrogatory No. 27**  
**Page 1 of 1**

QUESTION:

Identify and describe in detail the databases, tracking systems, asset management programs, and long-term planning documents utilized by FPL to monitor the condition, life expectancy, and planned replacement schedule of its existing transmission infrastructure. In your response, please explicitly detail:

- a. The specific engineering criteria, condition assessments, or operational metrics (e.g., chronological age, physical deterioration, failure rates, thermal limits) FPL utilizes to flag a transmission facility for targeted replacement or rebuild.
- b. The timeframe or planning horizon over which FPL projects its infrastructure replacement schedules (e.g., 5-year, 10-year, or 20-year capital plans).
- c. The specific internal department(s) or committee(s) responsible for maintaining this data and authorizing the replacement schedules.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Set of Interrogatories**  
**Interrogatory No. 28**  
**Page 1 of 1**

QUESTION:

When an existing transmission facility is identified as aging, deteriorating, or requiring replacement, describe in detail the analytical process and economic modeling FPL utilizes to determine the optimal replacement solution. Specifically, please address:

- a. Whether FPL's internal planning criteria permit automatic "like-for-like" replacements, or whether a holistic needs assessment is required for each aging asset.
- b. Whether FPL requires planners to affirmatively consider, model, and evaluate and GETs, including advanced conductors, as alternatives to defer the capital cost of a full infrastructure rebuild.
- c. If FPL does not routinely evaluate GETs as alternatives to replacing aging infrastructure, please explain how FPL ensures that its replacement capital expenditures satisfy the statutory requirement to deliver "abundant, low-cost electrical energy."

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's Second Set of Interrogatories**  
**Interrogatory No. 29**  
**Page 1 of 1**

QUESTION:

Identify every communication, meeting, or discussion—whether internal to FPL or external—in which the proposed Andytown-Oasis Project (AOP), or the reliability needs that FPL has identified in support of the AOP project, was discussed in relation to the Florida Reliability Coordinating Council (FRCC), the Biennial Transmission Planning Process (BTPP), or any potential regional transmission alternative. In your response, explicitly identify:

- a. Any communications between FPL personnel and FRCC staff, committee members, or external consultants regarding whether the AOP (or the constraints it resolves) should be modeled, evaluated, or designated as a regional project.
- b. Any communications between FPL personnel and representatives of other Florida electric utilities regarding the AOP and its potential impacts on the regional grid.
- c. Any internal communications or strategy discussions among FPL management, planners, or regulatory staff regarding how to present, or whether to present, the AOP to the FRCC.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's Second Set of Interrogatories**  
**Interrogatory No. 30**  
**Page 1 of 1**

QUESTION:

Identify every communication, meeting, or discussion—whether internal or external—regarding FPL's strategic posture, voting directives, or policy objectives within the FRCC's regional transmission planning processes over the last five (5) years. In your response, explicitly identify:

- a. Any internal FPL directives, talking points, or guidelines provided to FPL employees serving on FRCC committees regarding how to evaluate, vote on, or respond to proposed regional transmission projects.
- b. Any communications between FPL and other Florida utilities coordinating votes, policy positions, or responses to stakeholder proposals within the FRCC.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's Second Set of Interrogatories**  
**Interrogatory No. 31**  
**Page 1 of 1**

QUESTION:

Identify every internal or external communication, analysis, or strategic evaluation conducted by or on behalf of FPL regarding FERC Order 1000 and its mandate to identify Cost Effective or Efficient Regional Transmission Solutions (CEERTS). This includes, but is not limited to, communications explaining, questioning, or analyzing why the FRCC BTPP has consistently failed to identify or mandate regional transmission solutions in lieu of localized utility projects within FPL's service territory.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's Second Set of Interrogatories**  
**Interrogatory No. 32**  
**Page 1 of 1**

QUESTION:

Identify every internal or external communication, analysis, or strategic evaluation conducted by or on behalf of FPL regarding FERC Order 1920. In your response, explicitly identify:

- a. Any communications, internal memoranda, or consultant reports evaluating how Order 1920's mandate for long-term regional planning and "right-sizing" of local projects will impact FPL's capital expenditure plans or local transmission projects.
- b. Any communications between FPL and FRCC staff, or between FPL and other Florida utilities, regarding the strategy for drafting the FRCC's compliance filing for Order 1920.
- c. Any internal communications discussing whether the timing, scope, or necessity of the AOP is influenced by the impending implementation of Order 1920.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 1**  
**Page 1 of 2**

QUESTION:

Please produce all data, input files, output files, workpapers, and underlying assumptions utilized in any and all modeling performed by or on behalf of FPL in the planning, development, alternatives assessment, and justification of the proposed AOP. For clarity, the scope of this production request explicitly includes, but is not limited to:

- a. Power flow, contingency, and reliability modeling (e.g., PSS/E, PSLF) explicitly including the "Base Case" models, "Change Case" models, and specific contingency outputs demonstrating the NERC TPL-001-5.1 violations relied upon to justify the AOP.
- b. Production cost and economic dispatch modeling (e.g., PROMOD, PLEXOS) utilized to calculate system fuel savings, renewable curtailment impacts, economic benefits, and the dispatch of specific generation facilities projected to supply power across the AOP during Summer and Winter peaks in each of the first five years following the year in which the AOP is completed.
- c. Any specific sensitivity models run by FPL (e.g., high/low load growth, extreme weather, high/low natural gas prices).
- d. Load forecasting and spatial load allocation models.
- e. All spreadsheets and quantitative analyses used to calculate project capital costs, revenue requirements, or ratepayer impacts.

RESPONSE:

- a. Please refer to FPL's confidential responsive documents:
  - "y25\_33sRIs2-RP\_basecase\_P80\_ALT1\_FPL"
  - "y25\_33sRIs2-RP\_basecase\_P80\_ALT2\_FPL"
  - "y25\_33sRIs2-RP\_basecase\_P80\_FPL"
  - "y25\_33sRIs2-RP\_basecase\_P80\_TLSA\_FPL"
- b. Not applicable. AOP was identified solely to address projected violations of applicable planning criteria, including mandatory NERC reliability standards, and was not justified based on production cost and economic dispatch modeling.
- c. No sensitivity models were performed. No responsive documents.
- d. Please refer to FPL's response to Staff's Second Set of Interrogatories, No. 19 and 20, and Production of Documents, No. 4 for a description of FPL's long term load forecast process and the 2025 load calculation template for the development of the peak load forecast for Miami-Dade and Broward Counties.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 1**  
**Page 2 of 2**

- e. Please refer to FPL's response to Staff's First Set of Interrogatories, Nos. 12 and 13, and Staff's Third Set of Interrogatories, No. 31 for quantitative analyses used to calculate project capital costs, revenue requirements, or ratepayer impacts.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 5**  
**Page 1 of 1**

QUESTION:

Please produce all official meeting minutes, agendas, transcripts, audio/video recordings, and informal notes (including handwritten notes, internal memoranda, and post-meeting summaries) taken by or provided to FPL personnel regarding any FRCC meeting, committee meeting, or working group session held during the most recent BTPP cycle. This request is specifically limited to meetings where any of the following were presented, evaluated, or discussed:

- a. The localized transmission constraints or NERC reliability violations driving the need for the AOP.
- b. The AOP itself (or any of its localized geographic routing alternatives).
- c. The evaluation, screening, or dismissal of any Cost Effective or Efficient Regional Transmission Solutions (CEERTS) that could impact FPL's service territory.
- d. Internal documents generated by FPL employees serving in roles at FRCC related to most recent BTPP and FERC Order 1920 compliance development process.

RESPONSE:

See FPL's objections served contemporaneously herewith. Subject thereto, and without waiver of any objection, FPL responds as follows:

FPL has no responsive documents. The FERC Order 1920 materials are designated as "Privileged and Confidential; Subject to Joint Defense Agreement." Materials related to Florida Reliability Coordinating Council ("FRCC") Planning Committee and Order 1920 Task Force meetings are governed by the FRCC document control policy.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 6**  
**Page 1 of 1**

QUESTION:

Please produce the complete final study reports, appendices, and all associated native electronic modeling files for every FRCC BTTP conducted over the past ten (10) years (i.e., planning cycles from 2016 through the present). For clarity, this production request explicitly includes, but is not limited to:

- a. The final, approved BTTP reports detailing the system needs and approved regional or local transmission plans.
- b. All "Base Case" and "Change Case" power flow models (in native, executable formats such as PSS/E or PSLF) utilized to evaluate Florida's transmission constraints during each respective BTTP cycle.
- c. All economic dispatch models or production cost simulations utilized during each respective cycle to evaluate the economic impact of transmission congestion or the benefits of proposed solutions.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 8**  
**Page 1 of 1**

QUESTION:

Please produce all internal memoranda, email correspondence, presentation decks, engineering models, and cost-benefit analyses generated within the last 36 months that discuss, evaluate, compare, or dismiss any alternative to the AOP that was *not* formally presented as an alternative in the Petition. This explicitly includes documents evaluating the cost and efficacy of the AOP against Non-Wires Alternatives (NWAs) such as battery storage, Advanced Transmission Technologies (ATTs), or Grid-Enhancing Technologies (GETs).

RESPONSE:

FPL has no responsive documents.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 12**  
**Page 1 of 1**

QUESTION:

Please produce all internal load forecasting models, load-flow studies, and regional resource adequacy assessments that calculate or project the generation deficit, import requirements, and transmission transfer limits for the combined Miami-Dade and Broward County geographic region for the period of 2026 through 2036.

RESPONSE:

Please see confidential responsive document:

- “EDF POD 12 – Miami Dade & Broward Information”

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 13**  
**Page 1 of 1**

QUESTION:

Please produce all internal manuals, guidelines, planning criteria documents, standard operating procedures, and flowcharts utilized by FPL transmission planners that govern or prescribe how FPL considers and evaluates alternatives to proposed transmission projects are identified, modeled, and evaluated for the purposes of local planning and Need Determinations.

RESPONSE:

Please refer to the following Attachments to Exhibit A of the Petition filed on March 11, 2026, in Docket No. 20260020-EI:

- Attachment 5: The Transmission Planning Criteria
- Attachment 6: The Transmission Planning Process
- Attachment 10: Andytown-Oasis Expected Construction Schedule

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 14**  
**Page 1 of 1**

QUESTION:

Please produce all data, load-flow studies, economic analyses, or internal memoranda that FPL management or Scott Bores relied upon in his testimony in Florida PSC Docket No. 20250011-EI (the 2025 FPL rate case) to conclude that FPL's ability to supply power from outside of Florida is "more constrained than utilities with more access to regional options."

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 15**  
**Page 1 of 1**

QUESTION:

Please produce all current interregional power purchase agreements, firm transmission service agreements, and pricing term sheets governing the importation of wholesale power from outside the State of Florida into the FPL balancing authority.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 16**  
**Page 1 of 1**

QUESTION:

Please produce all current organizational charts, committee rosters, charters, and bylaws for the FRCC committees and working groups on which FPL employees currently serve, specifically including any documents governing member voting rights and dispute resolution within the BTPP.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 17**  
**Page 1 of 1**

QUESTION:

Please produce the most current version of any capital replacement schedules, "aging infrastructure" watchlists, or asset condition assessment reports that detail planned transmission facility replacements or rebuilds over the next ten (10) years, specifically including any such facilities located within or serving the combined Miami-Dade and Broward County region.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's First Request for Production**  
**Request No. 18**  
**Page 1 of 1**

QUESTION:

Please produce all internal manuals, engineering guidelines, and standard operating procedures documents in any format that govern or prescribe how FPL evaluates, prioritizes, and selects engineering solutions for aging or end-of-life transmission infrastructure.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's Second Request for Production**  
**Request No. 20**  
**Page 1 of 1**

QUESTION:

Produce all documents, analyses, and communications identified in, relied upon, or relating to your response to Interrogatory No. 29. This request explicitly encompasses all internal emails, instant messages (e.g., Microsoft Teams, Slack), memoranda, and handwritten notes, as well as all external correspondence with FRCC staff, other utilities, and third-party consultants regarding the interplay between the AOP and the FRCC planning process.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's Second Request for Production**  
**Request No. 21**  
**Page 1 of 1**

QUESTION:

Produce all documents, analyses, and communications identified in, relied upon, or relating to your response to Interrogatory No. 30. This includes all internal strategy documents, voting guides, and coordination emails between FPL and other FRCC member utilities designed to establish consensus, align voting, or dictate outcomes within the FRCC Biennial Transmission Planning Process.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's Second Request for Production**  
**Request No. 22**  
**Page 1 of 1**

QUESTION:

Produce all internal and external communications, legal memoranda, white papers, consultant reports, and economic analyses relating to FPL's compliance with, interpretation of, or strategic response to FERC Order 1000's regional planning mandates. This explicitly includes any internal correspondence discussing the absence of CEERTS projects within the Florida peninsula.

RESPONSE:

See FPL's objections served contemporaneously herewith.

**Florida Power & Light Company**  
**Docket No. 20260020-EI**  
**EDF's Second Request for Production**  
**Request No. 23**  
**Page 1 of 1**

QUESTION:

Produce all internal and external communications, legal memoranda, white papers, consultant reports, and economic analyses relating to FERC Order 1920. This request specifically demands the production of:

- a. All internal emails and strategy documents discussing how the Order 1920 mandates for "right-sizing" and advanced technology evaluations will affect FPL's local transmission planning and future Need Determinations.
- b. All communications, draft redlines, and meeting notes between FPL, FRCC staff, and other Florida utilities regarding the development of the FRCC's regional compliance strategy for Order 1920.
- c. All internal correspondence or analyses discussing whether to accelerate, modify, or advance localized projects (including the AOP) prior to the full implementation of the Order 1920 regional planning framework

RESPONSE:

See FPL's objections served contemporaneously herewith.

**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 20th day of April 2026:

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