

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination of need for
Andytown-Oasis transmission lines project in
Broward and Miami-Dade Counties, by Florida
Power & Light Company.

Docket No. 20260020-EI

Filed: April 29, 2026

POST-HEARING BRIEF OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel (“Citizens” or “OPC”), pursuant to the Order Establishing Procedure in this Docket, No. PSC-2026-0056-PCO-EI, issued March 12, 2026 (“Order Establishing Procedure” or “OEP”), hereby submit this Post-Hearing Brief.

STATEMENT OF BASIC POSITION

On February 9, 2026, Florida Power & Light (“FPL”) filed its notice of intent to file a Petition for transmission lines need determination for Andytown-Oasis transmission line project (“AOP”). The resulting Petition was filed on March 11, 2026. The notice of the April 7, 2026, Prehearing and April 23, 2026, Hearing was published March 6, 2026. Yet, the Order Establishing Procedure with the other key activities dates including Prehearing Statement date was not issued in the above docket until March 12, 2026. See, OEP. Given the accelerated 45-day pace from filing of the request to the hearing pursuant to Section 403.537(1)(a), Florida Statutes (“F.S.”), FPL must be held strictly to its burden to prove the need, including the cost-effectiveness, for each of the proposed transmission projects.

OPC intervened on March 20, 2026. See, Order No. PSC-2026-0078-PCO-EI, issued March 24, 2026. With Intervenor Testimony due March 24, 2026, a mere 14 days after the utility filed their Petition and testimony and 4 days after intervenor testimony, the extremely truncated schedule precluded OPC from obtaining their own expert or even conducting reasonable discovery.

Therefore, all required information absolutely needed to be completely and fully furnished with the Petition. However, in this case that was not done.

The required content for this Petition is set forth in Rule 25-22.076, Florida Administrative Code (“F.A.C.”). One required element is “[o]ne copy of the *complete* load flow analysis, including supporting documentation shall be filed with the Commission.” (Emphasis added.) The Petition is also required to contain the following information:

A summary discussion of the major alternative transmission lines or transmission improvements which were examined and evaluated by the utility in arriving at the decision to pursue the proposed project. The discussion shall consist of: (a) a general description of the other transmission line alternatives, including, if appropriate, load flow analyses and electrical system diagrams showing power flows and voltage profiles on the transmission lines in the more critical operating conditions and (b) a discussion of the performance of each alternative in terms of economics, reliability, long-term flexibility and usefulness, or other relevant factors.

See, Rule 25-22.076 (4), F.A.C. FPL did not include a copy of the complete load flow analysis done for this project with its Petition. HE 192 at pp. 125, 126. This information was not provided until April 3, 2026, 10 days after Intervenor Testimony was filed on March 24, 2026. HE 192 at pp. 125, 126, OEP. This was too late to be useful in crafting any intervenor testimony.

The only other transmission line alternatives presented by FPL in its Petition were two other transmission routes using the same voltage combinations for the new transmission lines. TR 37-38, HE 54, pp. 14-15. FPL did not present an evaluation of any possible technology alternatives to meet the transmission need such Advanced Transmission Technology (“ATT”) including Grid Enhancement Technologies (“GET”) and battery storage with its Petition. HE 54, pp. 14-15, HE 192 pp. 70-71, 78-81. FPL also failed to include any information in its Petition that evaluated potential regional solutions or the outcome of such analysis. HE 54, pp. 14-15, HE 192, 103-104. Since FPL failed to provide any of these alternatives with its Petition, FPL was unable to fulfill its

duty to discuss their performance as required under Rule 25-22.076 (4), F.A.C. As the Environmental Defense Fund, Inc. (“EDF”) witness Cranston testified, “FPL did not adequately consider alternative solutions, merely alternative routes.” TR 70. He explained that a prudent utility must evaluate entirely different classes of solutions to ensure ratepayer funds are being deployed as efficiently as possible. TR 71.

Information regarding alternatives and their evaluations should be provided to the Commission before the decision to approve or not approve the AOP is made. A delay for six to eight months to get this information would not affect the timetable FPL has for its construction schedule since the need determination process has an end date of October 2027, a year and half from the hearing. HE 54, Attachment 10.

STATEMENT OF FACTUAL ISSUES AND POSITIONS

ISSUE A: **Is FERC Order No. 1000 relevant to this proceeding and within the Commission’s jurisdiction to consider?**

OPC POSITION: *Yes, FERC Order No. 1000 is relevant to this proceeding and within the Commission’s jurisdiction to consider under federal and state law.*

ARGUMENT:

Under the Florida Transmission Line Siting Act (“TLSA”), the Commission shall be the sole forum to make any required determination of any need for a transmission line in Florida. See, 403.537(a)(b), F.S. In such a determination, the Commission must consider the following:

In the determination of need, the commission shall take into account the need for electric system reliability and integrity, the need for abundant, low-cost electrical energy to assure the economic well-being of the residents of this state, the appropriate starting and ending point of the line, **and other matters within its jurisdiction deemed relevant to the determination of need.** The appropriate

starting and ending points of the electric transmission line must be verified by the commission in its determination of need.

(Emphasis added). See, 403.537(c), F.S. The bolded language gives the Commission broad discretion to consider matters that impact transmission and its costs. Further, Rule 25-22.076 (3), F.A.C., requires that within a transmission need determination filing application:

Documentation shall include load flow studies on a peninsular Florida basis, a Gulf Power basis, a Southern Electric System basis or some combination of these and, when applicable, inclusion of adjoining states showing power flows and voltage profiles on the transmission lines in the more critical operating conditions.

Plainly, the Commission rule requires information regarding potential regional impacts. This would require consideration of interstate information which would also be subject to Federal Energy Regulatory Commission (“FERC”) jurisdiction. Therefore, the Commission has already determined by this rule that it is appropriate to consider regional information that may also be subject to FERC jurisdiction in making its determination of need.

FPL witness Miguel Yanes testified that the AOP project is subject to compliance with North American Electric Reliability Corporation (“NERC”) Reliability Standards. TR 29. NERC works with FERC¹ and enforces these mandatory reliability standards. TR 144-145. Mr. Yanes testified that he has served on various NERC groups including the Florida Reliability Coordinating Council (“FRCC”) as Chair for Interregional Transfer Capability Study. TR 26. He also testified that he is a member of the North American Transmission Forum, Chair of the FRCC Federal Energy Regulatory Commission Task Forces for Order 881 and Order 1920, and serves as NERC Certified Reliability Coordinator. TR 26. Evidently, there is significant overlap and coordination between the federal and state level regarding transmission regulation.

¹ NERC worked with FERC to establish the calculation for available transfer capability under the open access tariff. See, FERC Order No. 890 A, Paragraph 2.

Mr. Yanes testified that FPL's transmission system interconnects with a larger transmission network, which includes the other Florida utilities and the Eastern Interconnection ("EI") network. TR 29. He stated that the EI reaches from central Canada eastward to the Atlantic coast, south to Florida and west to the foot of the Rockies. TR 29. He asserted that the EI has multiple points of interconnection with other utilities that enable power to be exchanged during planned and unplanned scenarios. TR 29. The provisions of Rule 25-22.076 (3), F.A.C., as noted above, recognize this intertwined relationship.

Clearly, the Commission rule requires information regarding potential regional impacts. The Commission has already determined by rule that it is appropriate to consider regional information in making its determination of need.

FERC Order No. 1000 requires that transmission providers participate in regional transmission planning process and produce a regional plan. See, FERC Order No. 1000, Paragraph 302. The FERC Order No. 1000 process also provides that local and regional transmission planning must provide an opportunity to identify and evaluate transmission needs driven by the public policy requirements imposed by state or federal laws or regulations. Id. at Paragraph 303. FERC Order No. 1000 is currently in effect for FPL.

As the FERC stated in Order No. 1000, nothing in its requirements [to conduct regional planning] interferes with states' authority to require integrated resource planning or utilities' obligation to comply with such requirements. See, FERC Order No. 1000, Paragraph 177. In fact, in Order No. 1000, FERC stated their belief that greater participation in its transmission process may identify more efficient or cost-effective transmission solutions. Id. at Paragraph 178. Mr. Yanes confirmed that the FERC Order No. 1000 regional planning process – governed by FERC

requirements and executed by the FRCC and utility local reliability planning processes – serves complementary purposes, addressing both regional and local area deficiencies. TR 152.

Thus, FERC Order No. 1000 is relevant to this proceeding and within the Commission’s jurisdiction to consider under federal and state law.

ISSUE B: Are FERC Order Nos. 1920, 1920-A, and 1920-B relevant to this proceeding and within the Commission’s jurisdiction to consider?

OPC POSITION: *FERC Order No. 1920 is relevant to this proceeding and within the Commission’s jurisdiction to consider under federal and state law.*

ARGUMENT:

As discussed in Issue A, the Commission under Section 403.537(a)(b), F.S., must consider the following:

In the determination of need, the commission shall take into account the need for electric system reliability and integrity, the need for abundant, low-cost electrical energy to assure the economic well-being of the residents of this state, the appropriate starting and ending point of the line, **and other matters within its jurisdiction deemed relevant to the determination of need.** The appropriate starting and ending points of the electric transmission line must be verified by the commission in its determination of need.

(Emphasis added). See, 403.537(c), F.S. The bolded language gives the Commission broad discretion to consider matters that impact transmission and its costs. Under Rule 25-22.076 (3), F.A.C., the Commission has already determined that it is appropriate to consider regional interstate information and impact in making its determination of need.

On May 2024, FERC issued Order No. 1920 to address deficiencies in the FERC’s existing regional and local transmission processes under FERC Order No. 1000. See, FERC Order No. 1920, Paragraph 1. FERC found that the existing planning process was unjust, unreasonable, and

unduly discriminatory or preferential because in part it does not require transmission providers to perform sufficiently long-term assessment of transmission needs that identifies Long-Term Transmission Needs. Id. at Paragraph 1. Specifically, FERC Order No. 1920 states that its final rule requires that regional planning consider more fully the alternative transmission technologies of dynamic line ratings, advanced power flow control devices, advanced conductors, and transmission switching in Long-Term Regional Transmission Planning. Id. at Paragraph 8.

Mr. Yanes testified under FERC Order 1920, FPL will conduct a three-year study every five years. HE 192, 112. He stated that the first FERC compliance filing was not due until June 12, 2026. Id. He also stated that FERC Order 1920-A revised the first planning cycle start to June 12, 2028. Id. FPL witness McLain testified that there is a FERC-approved 1920 transmission planning process that is not yet in effect for FPL and the completion of the first planning cycle under that process is still several years away. TR 133-134.

However, EDF witness Cranston testified that utilities like FPL under FERC orders must engage in planning with their regional grid planner (FRCC in Florida) to find statewide solutions that address system-wide need. TR 59. He stated that FERC 1000 inadvertently created a “local loophole” in transmission planning which allowed for right of first refusal, avoidance of competitive bidding and far less regulatory scrutiny. TR 60. FERC Order No. 1920 was issued to force transmission providers to take a broader, more forward-looking [20-year horizon] view of grid reliability and rein in the over-reliance on inefficient local projects. TR 60-61. FERC Order No. 1920 also includes looking at whether local transmission projects can be “right-sized,” expanded or modify scale to address broader regional needs and evaluate the use of advanced transmission technologies in lieu of a new transmission lines. TR 61-62. EDF witness Thomas testified that no regional projects have been approved under the FRCC planning process under

FERC Order No. 1000. TR 97. He stated that because the FRCC framework systematically fails to advance regional efficiencies, it is incumbent upon the Commission to rigorously scrutinize FPL's application. TR 98.

It is inconsistent to suggest that the FERC Order 1920 has no role in Florida or that the Commission must wait for the planning cycle to officially start, as Florida's Investor Owned Utilities have been actively participating in a series of stakeholder meetings hosted by the FRCC, and must make their compliance filings pursuant to FERC Order 1920 at FERC no later than June 12, 2026. HE 192, 171-172, TR 133. So, there is nothing that prohibits this Commission from taking into consideration the FERC Order No. 1920 criteria when determining whether to approve the AOP. In fact, the proposed in-service date for the AOP is December 2033, after the full implementation of FERC Order No. 1920. Thus, FERC Order No. 1920 is relevant to this proceeding and within the Commission's jurisdiction to consider under federal and state law.

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

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

OPC POSITION: *FPL maintains the burden to prove need for each of proposed projects. FPL has not done its transmission studies at a P50. No NERC requirements mandate a P80 or P50 in transmission studies. The results of transmission studies should be presented using P50 to demonstrate whether the same

transmission needs result. The Commission should have results of both P50 and P80 transmission studies to make a fully informed determination of transmission needs in Miami-Dade County. *

ARGUMENT:

OPC does not object to the addition of new transmission lines if after a thorough review, with all relevant information, it is proven to be needed as requested and that the proposal is the best solution. Witness Yanes is FPL's main witness testifying regarding the need for new transmission and the proposed AOP. Mr. Yanes testified regarding the FPL planning process for determining the need for new transmission lines. TR 33. He identified five major steps that FPL takes in the process. These steps are as follows: (1) the preparation of system models, (2) assessment of the transmission performance to comply with NERC Reliability Standards, (3) development and evaluation of transmission expansion alternatives, (4) selection and approval of the preferred alternatives, and (5) incorporation of the expansion plan into the FRCC Regional Planning Process. TR 33.

Witness Yanes testified that FPL plans, designs, and operates its transmission system to comply with the NERC Reliability Standard TPL-001-5.1. TR 33. NERC's TPL0001-5.1 defines scenarios and expected levels of system performance that the Bulk Electric System ("BES") must comply within the long-term planning horizon. TR 33. A copy of the TPL-001-5.1 was included as Attachment 5 to the Petition. HE 54, pp 1-6. Pages 3 through 6, Attachment 5, of the Petition contains a table of the P system contingencies that defines the scenarios and expected levels of system performance with which the BES must comply within long-term planning. HE 54.

Mr. Yanes stated the purpose of planned transmission system is that with its expected loads and transfers, it must be stable and with the applicable ratings for all categories of the contingency scenarios. TR 34. He testified that FPL performed transmission studies that identified by 2033

that FPL's existing transmission network will not be able to support the growing Miami-Dade County load. TR 34. Based on these studies, he concluded that additional facilities were needed to meet transmission reliability and increase transfer capability for Miami-Dade County. TR 34. Particularly, he stated that these 2025 studies identified the future contingency scenarios and corresponding system stability challenges including thermal overload and low voltage conditions that must be addressed to maintain compliance with the NERC Reliability Standards TPL-001.5.1 and NUC-001-4. TR 34-35. He also cited these additional bases as supporting the need for the new transmission: (1) maintaining transmission reliability, (2) increasing power transfer capability, and (3) providing resilient, hardened transmission service. TR 35.

FPL has load growth projections for Miami-Dade County for 2033 of 7200 MW. TR 35-36. Mr. Yanes testified that FPL experienced summer peak loads between 6,014 MW and 6,239 MW from 2023 through 2025 to reinforce that Miami-Dade County is already experiencing high load. TR 35. Mr. Yanes clarified that the load growth for the AOP did not include data centers. HE 192, 167-168. He stated that he used a P80 for his transmission studies meaning that there is a 20 percent chance, probability that summer peak will exceed the number under a P80. HE 192, p 10. However, he conceded that the ten-year site plan used a P50 scenario that was reflected in Attachments 2 and 3 to the Petition. HE 54, HE 192, 9-10. He also acknowledged that there is no NERC requirement to use a P80 for transmission studies rather than a P50. HE 192, 10.

FPL maintains the burden to prove the need for each of the proposed transmission projects. FPL has not done its transmission studies at a P50. There is no NERC requirement that requires using a P80 or P50 in transmission studies. FPL should be required to present the results of transmission studies done using P50 to demonstrate whether the same transmission needs result.

The Commission should have the results of both P50 and P80 transmission studies so it can make a fully informed determination of the nature of the transmission needs in Miami-Dade County.

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

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

OPC POSITION: *FPL maintains the burden to prove the need for each of the proposed transmission projects. FPL should provide all required information regarding transmission alternatives including Advanced Transmission Technology, including Grid Enhancement Technologies and battery storage, with its Petition to meet its obligation under Section 403.537, Florida Statutes.*

ARGUMENT:

On February 9, 2026, FPL filed its notice of intent to file a Petition for transmission lines need determination for AOP. The resulting Petition was filed on March 11, 2026, that included the information that FPL claimed comported with its obligation under Section 413.537, F.S., to demonstrate its proposed AOP – when taking into account the need for abundant, low-cost electrical energy to assure the economic well-being of the citizens of the State – is the appropriate solution. FPL did not provide all of the required information such that the Commission cannot make a fully and completely informed decision.

Rule 25-22.076, F.A.C., sets forth the required elements of the Petition. This includes “[o]ne copy of the complete load flow analysis, including supporting documentation shall be filed with the Commission.” The Petition is also required to contain the following information:

A summary discussion of the major alternative transmission lines or transmission improvements which were examined and evaluated by the utility in arriving at the decision to pursue the proposed project. The discussion shall consist of: (a) a general description of the other transmission line alternatives, including, if appropriate, load flow analyses and electrical system diagrams showing power flows and voltage profiles on the transmission lines in the more critical operating conditions and (b) a discussion of the performance of each alternative in terms of economics, reliability, long-term flexibility and usefulness, or other relevant factors.

See, Rule 25-22.076(4), F.A.C. FPL did not include a copy of the complete load flow analysis done for this project with its Petition. HE 192 at pp. 125, 126. This information was not provided until April 3, 2026, 10 days after Intervenor Testimony was filed on March 24, 2026. HE 192 at pp. 125, 126, See, OEP. This was too late to be useful in crafting any intervenor testimony. Without the timely provision of this critical information, intervenors and the Commission did not have time to test or evaluate whether the AOP is the lowest cost solution to address the identified problem given the truncated nature of this proceeding.

The rule requires that FPL provide transmission line alternatives. However, the only other transmission line alternatives presented by FPL in its Petition and testimony were two alternative transmission routes using the same voltage combination for the new transmission lines. TR 37-38, HE 54, pp. 14-15.

In deposition, Mr. Yanes acknowledged that they went through a gamut of solutions including transmission, generation, battery storage and others that were only explored in a “table-top” discussion. HE 192, p. 72. Yet, FPL chose only to present transmission build solutions using three different routes. TR 37-38, HE 54, pp. 14-15. FPL did not present an evaluation of any

possible technology alternatives such as ATT including GET and battery storage with its Petition. HE 54, pp. 14-15, HE 192 pp. 70-71, 78-81. He conceded that he did not have any cost benefit analysis of the technology versus the AOP. HE 192, 164. Mr. Yanes also acknowledged that he did not examine improving overall FPL system economics. HE 192, 169.

FPL did not include any information in its Petition stating it evaluated any potential regional solutions or the outcomes of such analysis. HE 54, pp. 14-15, HE 192, 104-107. In his deposition, Mr. Yanes acknowledged that they do not typically discuss specific projects at the FRCC. HE 192, 107. As the EDF witness Cranston testified “FPL did not adequately consider alternative solutions, merely alternative routes.” TR 70. He explained that a prudent utility must evaluate entirely different classes of solutions to ensure ratepayer funds are being deployed as efficiently as possible. TR 71. FPL provided only three transmission build alternatives with its Petition, and did not discuss any other potential alternatives or why they were or were not appropriate.

Information regarding alternatives and their evaluations should be provided to the Commission before the decision to approve or not approve the AOP is made. A delay for six to eight months to get this information would not affect the timetable FPL has for its construction schedule. The need determination process has an end date of October 2027, a year and half from the hearing. HE 54, Attachment 10.

FPL maintains the burden to prove the need for each of the proposed transmission projects. FPL should provide all possible information regarding transmission alternatives including ATT, including GET and battery storage, with its Petition to meet its obligation under Section 403.537, Florida Statutes.

- ISSUE 3:** **Are Florida Power & Light Company’s proposed starting and ending points appropriate for the:**
- (A) 500-kV transmission line to start at existing Andytown substation in Broward County and end at planned Oasis substation in Miami-Dade County?**
 - (B) 500-kV transmission line to start at existing Quarry substation in Miami-Dade County and end at planned Oasis substation in Miami-Dade County?**
 - (C) 230-kV transmission line to start at planned Oasis substation in Miami-Dade County and end at existing Quarry substation in Miami-Dade County?**
 - (D) 230-kV transmission line to start at planned Oasis substation in Miami-Dade County and end at existing Levee substation in Miami-Dade County?**

OPC POSITION: *FPL has not supported the need for the AOP, so the proposed starting and ending points for each of these proposed transmission projects has not been established. FPL maintains the burden to prove the appropriateness of the proposed starting and ending points for each of the proposed transmission projects.*

ARGUMENT:

As discussed in Issue 1, FPL has failed to provide sufficient transmission studies to establish the need for the AOP. Additionally, for the reasons discussed in Issue 2, FPL has failed to provide sufficient alternatives to the AOP. Without additional information, the Commission cannot fully and completely evaluate the need for the AOP, including the start and end points proposed in FPL’s Petition.

However, if the Commission determines that there is sufficient information to proceed with the AOP, OPC supports the most cost-effective transmission route. OPC has no position on the appropriateness of the start and end point of the individual proposed lines.

However, FPL has not supported the need for the AOP, so the proposed starting and ending points for each of these proposed transmission projects has not been established. FPL maintains the burden to prove the appropriateness of the proposed starting and ending points for each of the proposed transmission projects.

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

(A) 500-kV Andytown-Oasis transmission line project?

(B) 500-kV Quarry-Oasis transmission line project?

(C) 230-kV Oasis-Quarry transmission line project?

(D) 230-kV Oasis-Levee transmission line project?

OPC POSITION: *The proposed transmission projects should not be granted at this time until FPL provides additional P50 and transmission alternatives information, and the Commission has had the opportunity to fully and completely evaluate it. FPL maintains the burden to prove the need for each of the proposed transmission projects. *

ARGUMENT:

As discussed in Issue 1, FPL failed to provide sufficient transmission studies to establish the need for the AOP. Additionally, for the reasons discussed in Issue 2, FPL has not provided sufficient alternatives to the AOP. Without this additional information, the Commission cannot fully and completely evaluate the need for the AOP.

Information regarding transmission alternatives and their evaluations should be provided to the Commission before the decision to approve or not approve the AOP is made. A delay for six to eight months to get this information would not affect the timetable FPL has for its

construction schedule. The need determination process has an end date of October 2027, a year and half from the hearing. HE 54, Attachment 10.

The need for proposed transmission projects should not be determined at this time until FPL provides additional P50 transmission studies and transmission alternatives information, and the Commission has had the opportunity to fully and completely evaluate it. FPL maintains the burden to prove the need for each of the proposed transmission projects.

ISSUE 5: **Should this docket be closed?**

OPC POSITION: OPC takes no position.

ARGUMENT:

OPC takes no position.

Dated this 29th day of April, 2026.

Respectfully submitted,

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CERTIFICATE OF SERVICE
DOCKET NO. 20260020-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 29th day of April, 2026, to the following:

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