

4. Statement of Substantial Interest. FEA consists of certain agencies of the United States Government which have offices, facilities, or installations in the service area of Florida City Gas (“FCG”) and purchase natural gas service from FCG. The Department of Defense, through the Department of the Air Force, was delegated authority by the General Services Administration to represent the consumer interest of the FEA in this proceeding under 40 U.S.C. §§ 501(c)(2) and 121(d).

5. In this case, the Florida Public Service Commission (“Commission”) will consider FCG’s request for a general base rate increase and request for an increase in its overall rate of return from 6.44% to 8.31%. Utility costs represent one of the largest variable expenses of operating the FEA, consequently FEA’s various missions within FCG’s service territory will be significantly affected by any action this Commission takes in this docket. For these reasons, FEA has a substantial interest in the above-captioned docket.

6. Notice of Docket: FEA monitored the Commission’s docket and learned of FCG’s filing of a general rate increase on 20 April 2026.

7. Disputed Issues of Material Fact: FEA has not identified all disputed issues of material fact at this time. However, the FEA expects that disputed issues of material fact will include determining the appropriate allocation of FPL’s cost of providing services among its customer classes and determining the appropriate rates to be charged by FPL for its service to each customer class.

8. FEA reserves all rights to raise additional issues in accordance with the Commission’s rules and anticipated Order Establishing Procedure in this case.

9. Facts: A number of entities represented by FEA take service from FCG. These entities include, but are not limited to, Patrick Space Force Base, Cape Canaveral Space Force Station, Kennedy Space Center, U.S. Army Garrison Miami, the Veterans Affairs Administration and the United States Postal Service. These entities will be significantly affected by any action the Commission takes in this docket, therefore FEA has substantial interests that are subject to determination in this docket. Accordingly, FEA is entitled to intervene and participate in the proceeding, which will determine the fair, just, and reasonable rates to be charged by FCG.

10. FEA meets the three-prong associational standing test.¹ With regard to the first prong, the installations represented by FEA are located in FCG's service area² and receive service from FCG, for which they are charged FCG's applicable service rates. Therefore, the agencies FEA represents will be substantially affected by the Commission's determinations in this proceeding concerning FCG's petition for a general base rate increase. Regarding the second prong of the test, the subject matter of the proceeding falls within FEA's general scope of interest and activity. Ensuring that federal tax dollars are spent on fair, just, and reasonable utility rates falls within the purview of FEA's general scope of interest. With respect to the third prong of the test, FEA seeks intervention in this docket to represent the interests of its agencies, as FCG customers, in seeking reliable service and fair, just, and reasonable rates. Therefore, FEA asserts that it meets the requirements for standing in this docket.

11. Rules and Statutes Justifying Relief: The rules and statutes that entitle FEA to intervene and participate in this case include, but are not limited to:

¹ Florida Home Builders Association v. Department of Labor and Employment Security, 412 So. 2d 351, 353-54 (Fla. 1982); Farmworker Rights Organization, Inc. v. Department of Health and Rehabilitative Services, 417 So. 2d 753, 754 (Fla. 1st DCA 1982).

² Florida Statutes Section 163.3175 (2) (n) notes Patrick Space Force Base and Cape Canaveral Space Force Station are associated with Brevard County and Satellite Beach.

- a. 40 U.S.C. Section 501(c);
- b. 40 U.S.C. Section 121(d);
- c. Section 120.569, Florida Statutes;
- d. Section 120.57, Florida Statutes;
- e. Section 366.04, Florida Statutes;
- f. Section 366.05, Florida Statutes;
- g. Section 366.06, Florida Statutes;
- h. Rule 28-106.201, Florida Administrative Code;
- i. Rule 28-106.205, Florida Administrative Code

12. Conferral with Parties of Record: In accordance with Rules 28-106.204(3) and 28-106.205(2)(e), counsel for FEA conferred with the parties of record. While none of the parties objected to the FEA's intervention, the Office of Public Counsel takes no position, pending review of the Petition to Intervene.

13. Relief Requested: FEA requests permission to intervene as a full party in this docket.

WHEREFORE, FEA respectfully requests the Commission enter an order granting this petition and thereby allowing FEA to intervene and participate as a full party in this docket.

Respectfully submitted,

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CERTIFICATE OF SERVICE
Docket No. 20260026-GU

I HEREBY CERTIFY that a true and correct copy of the foregoing Federal Executive Agencies' Petition to Intervene has been furnished by electronic mail this 12th day of June 2026, to the following:

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