

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: June 12, 2026

**FLORIDA POWER & LIGHT COMPANY’S RESPONSE IN OPPOSITION TO
ENVIRONMENTAL DEFENSE FUND, INC.’S REQUEST FOR ORAL ARGUMENT**

Florida Power & Light Company (“FPL”) hereby files this response in opposition to the request of the Environmental Defense Fund, Inc. (“EDF”) for oral argument (“Request”) on its pending Motion for Reconsideration of Order No. PSC-2026-0179-FOF-EI (“Motion”), both filed with the Florida Public Service Commission (“Commission”) on June 8, 2026. As explained below, EDF’s Request fails the legally requisite obligation to demonstrate why oral argument would aid the Commission and, therefore, the Request should be denied. In support, FPL states as follows:

1. Granting or denying a request for oral argument is within the Commission’s discretion. Fla. Admin. Code R. 25-22.0022(3). However, a request for oral argument is not guaranteed or automatically approved, and a party does not obtain it simply by asking. Rather, a “request for oral argument *shall state with particularity why oral argument would aid the Commissioners ... in understanding and evaluating the issues to be decided.*” Fla. Admin. Code R. 25-22.0022(1) (emphasis added). Thus, the party requesting oral argument has the burden to affirmatively demonstrate why argument is necessary. EDF does not meet that burden.

2. EDF asserts that oral argument would aid the Commission in understanding EDF’s “inherently nuanced” positions regarding the Commission’s jurisdiction, which EDF contends

were mischaracterized in Order No. PSC-2026-0179-FOF-EI.¹ But EDF does not identify any specific issue, legal standard, record citation, or aspect of its Motion that requires oral argument for the Commission to understand or evaluate it. Nor does EDF explain why the written Motion and FPL's written response are insufficient.

3. EDF's claim that its jurisdictional arguments are "inherently nuanced" is not a showing with particularity why oral argument would aid the Commissioners – it is a conclusion. At most, it restates the general purpose of oral argument under Rule 25-22.0022. That is not enough. If a party could satisfy the rule merely by labeling its position "nuanced," the rule's particularity requirement would have no practical meaning.

4. Further, clarifying its nuanced positions on Commission jurisdiction falls short of EDF's affirmative duty under Rule 25-22.0022 to plead with *particularity why oral argument would aid* the Commissioners. This failure cannot be cured through the oral argument itself. The rule requires the requesting party to explain in the request itself why oral argument would aid the Commission. EDF did not do so.

5. In summary, EDF's Request fails on its face to meet the affirmative burden required to warrant oral argument. FPL therefore submits that EDF's Motion, and FPL's response to the Motion, are sufficient on their face to evaluate and decide the Motion without the need for further argument or explanation.

6. Under the specific facts and circumstances present here, FPL submits that oral argument is entirely unnecessary and would not be a prudent use of time and resources of the Commission, Staff, or the parties.

¹ See EDF Request, pp. 1-2. Although EDF's Motion also asks the Commission to reconsider whether the Commission may have overlooked three specific factual points in the record in making its decisions in this proceeding, EDF does not address this part of its Motion in its Request.

WHEREFORE, for all the foregoing reasons, FPL respectfully requests that the Commission deny EDF's Request for Oral Argument.

Respectfully submitted this 12th day of June 2026,

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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 12th day of June 2026:

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