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July 1, 2026

VIA: ELECTRONIC FILING

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

IN RE: Storm Protection Plan Cost Recovery Clause
FPSC Docket No. 20260010- EI

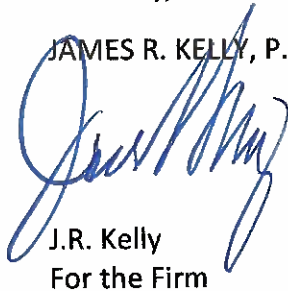
Dear Mr. Teitzman:

Attached for filing in the above docket is the City of Panama City, Florida's Motion For Leave to File Direct of Testimony of Jonathan Hayes In Support of Standing.

Thank you for your assistance in this matter, and please let me know if you have any questions.

Sincerely,

JAMES R. KELLY, P.A.

A handwritten signature in blue ink, appearing to read "J.R. Kelly", is written over the typed name and title.

J.R. Kelly
For the Firm

JRK/jk
Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan
Cost Recovery Clause

DOCKET NO. 20260010-EI
FILED: July 1, 2026

**CITY OF PANAMA CITY'S MOTION FOR LEAVE TO FILE
DIRECT TESTIMONY OF JONATHAN HAYES
IN SUPPORT OF STANDING**

The City of Panama City, Florida (the "City"), by and through undersigned counsel and pursuant to Rules 28-106.204 and 28-106.211, Florida Administrative Code, respectfully moves the Florida Public Service Commission (the "Commission") for leave to file the direct testimony of Jonathan Hayes, City Manager of the City of Panama City, in support of the City's standing in this docket. In support of this Motion, the City states:

1. This docket concerns the Storm Protection Plan Cost Recovery Clause and the recovery of costs that affect rates charged to customers of Florida Power & Light Company ("FPL"), including the City.

2. Pursuant to the Order Establishing Procedure issued on February 6, 2026, the deadline for intervenor testimony and exhibits was June 16, 2026.

3. On April 10, 2026, the Prehearing Officer entered an Order granting the City's Petition to Intervene.

4. In the April 10, 2026, Order, the Prehearing Officer stated: "Based on the foregoing, Panama City has made allegations sufficient to satisfy Agrico and its petition to intervene shall be granted subject to proof of standing or stipulations that there are sufficient facts to support all elements for standing."

5. On or about April 8, 2026, and prior to the entry of the Order, the undersigned attorney for the City was contacted by the Commission's attorney of record at that time for this docket regarding the City's Petition to Intervene. The undersigned attorney was informed that an order granting the City's Petition to Intervene would be issued within a few days. The undersigned attorney was further informed by the Commission's attorney of record for this docket that he had communicated with FPL, and that FPL did not object to the City intervening in this docket. When asked by the undersigned attorney, the Commission's attorney of record stated that no additional information or documentation was necessary from the City in regard to its Petition. Based upon this conversation with the attorney of record, the undersigned attorney assumed that the City did not need to file testimony to support its pleading that the City was indeed a customer of FPL and had a right to intervene in this docket.

6. FPL filed no opposition to the City's Petition to Intervene, sought no limitation on the City's participation, and has not claimed any prejudice from the City's involvement in this proceeding. Since that time, FPL has also responded to the City's interrogatories and requests for production of documents, further confirming through its conduct that FPL has recognized and treated the City as a party to this docket. In that posture, the City submits that Mr. Hayes's brief testimony is a prudent record-completion measure in support of standing, is not being offered as merits testimony, and is not an effort to reopen or alter the substantive testimony schedule.

6. Mr. Hayes's testimony is narrow. It establishes that the City is an FPL customer and ratepayer, that the City purchases electric service from FPL for municipal purposes, and that the Storm Protection Plan Cost Recovery Clause affects the rates paid by the City.

7. The testimony does not address the merits of FPL's requested recovery, project selection, prudence, reasonableness, or any disputed substantive issue in this docket. It is offered solely to

support the City's standing and to remove any potential uncertainty concerning the City's right to participate fully as an intervenor.

8. Acceptance of the testimony will not prejudice FPL, Commission Staff, or any party. The facts addressed in Mr. Hayes's testimony are straightforward, non-controversial, and independently reflected in FPL's own customer records. As stated above, FPL has not objected to the City's intervention, FPL has responded to the City's discovery as a party, and no party will be deprived of any meaningful procedural right by acceptance of this limited standing testimony.

9. Good cause exists to accept the testimony because doing so will promote the orderly and efficient resolution of the docket by ensuring that the record contains direct evidentiary support for the City's standing without creating a collateral procedural dispute over an issue FPL has not opposed.

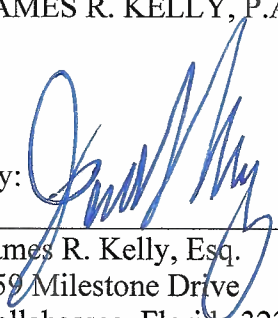
10. Pursuant to Rule 28-106.204(3), Florida Administrative Code, counsel for the City has conferred with counsel for the parties of record regarding this Motion. The following take no position: Tampa Electric Company, Florida Public Utilities Company, PCS Phosphate, Florida Industrial Power Users Group, and Nucor Steel Florida, Inc. The Office of Public Counsel, FPL and Duke Energy take no position at this time and reserve the right to file a response when the City's Motion is filed.

WHEREFORE, the City of Panama City respectfully requests that the Prehearing Officer enter an order granting this Motion and accepting the direct testimony of Jonathan Hayes for the limited purpose of establishing and supporting the City's standing in this docket.

Submitted this 1st day of July 2026.

Respectfully submitted,

JAMES R. KELLY, P.A.

By: 

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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 this 1st day of July 2026, to all parties and persons on the official service list maintained by the Florida Public Service Commission for Docket No. 20260010-EI.

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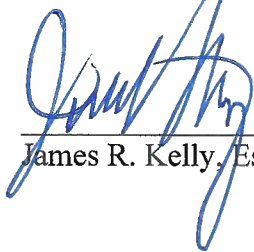
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