

<u>Witness</u>	<u>Subject Matter</u>	<u>Issue No(s).</u>
DIRECT		
Jody L. Brooks	Description of JEA and case supporting request for need determination for St. Johns River Power Park (SJRPP) Unit 3; introduction of other supporting witnesses; adverse consequences of denial.	1, 2, 3, 4, 5, 6, 7
James Stancin	Overview of SJRPP Unit 3, including the site, technology, related facilities, operating assumptions and costs, and construction schedule; JEA's construction and operation experience; adverse consequences of denial.	1, 3, 4, 5, 6
Melinda Fischer	JEAs load forecast and power supply planning process; JEAs request for proposals (RFP) process and evaluation; SJRPP Unit 3 fuel supply, transportation, and fuel diversity; JEAs transmission planning and facilities and impacts of SJRPP Unit 3; adverse consequences of denial.	1, 2, 3, 4, 5, 6
Hua Fang	Fuel forecasts.	4, 5, 6
Matt M. Oakes	Capital and operating cost and performance estimates for natural gas generating unit alternatives to SJRPP Unit 3.	5, 6
Brian Pippin	JEAs demand-side management (DSM) and conservation measures; availability of additional DSM and conservation measures to mitigate SJRPP Unit 3 need.	2, 5, 6
Jim Herndon	Results of analysis of available additional DSM or conservation measures to mitigate SJRPP Unit 3 need.	2, 5, 6

<u>Witness</u>	<u>Subject Matter</u>	<u>Issue No(s).</u>
Bradley E. Kushner	Capacity expansion and production cost modeling to compare alternatives and determine SJRPP Unit 3 as most cost-effective; cost and performance estimates for solar, battery energy storage systems, and small modular reactor generating alternatives to SJRPP Unit 3; existence of conservation measures to mitigate JEA's need for SJRPP Unit 3; adverse consequences of denial.	1, 2, 3, 4, 5, 6, 7
Wayne J. Oliver	Independent evaluation of JEA's RFP evaluation process.	3, 5, 6

2. Known Exhibits: Petitioner intends to offer the following exhibits:

<u>Witness</u>	<u>Proffered By</u>	<u>Exhibit #</u>	<u>Description</u>	<u>Issue #</u>
Jody Brooks	JEA	JB-1	Resume of Jody Brooks	1, 2, 3, 4, 5, 6, 7
Jody Brooks	JEA	Revised JB-2	JEA Need Study (Rev. 1) Sections 1.0, 1.1, 1.2, 1.7, 1.8, 2.0, 3.0, 3.1, 3.3, 3.3.3, 8.0, 9.0, and all tables and figures referenced therein.	1, 2, 3, 4, 5, 6, 7
Jody Brooks	JEA	JB-3	JEA Service Territory	1, 3, 4
Jody Brooks	JEA	JB-4	JEA Existing Power Purchase Agreement Schedule	1, 3, 4
James Stancin	JEA	JS-1	Resume of James Stancin	1, 2, 3, 4, 5, 6
James Stancin	JEA	JS-2	Project Layout	1, 3, 4
James Stancin	JEA	JS-3	Site Location	1, 3, 4
James Stancin	JEA	JS-4	Renderings	1, 3, 4
James Stancin	JEA	JS-5	Site and Vicinity	1, 3, 4
James Stancin	JEA	JS-6	Capital Cost Estimate	1, 2, 3, 4, 5, 6

<u>Witness</u>	<u>Proffered By</u>	<u>Exhibit #</u>	<u>Description</u>	<u>Issue #</u>
James Stancin	JEA	Revised JB-2	JEA Need Study (Rev. 1) Sections 1.3, 3.3.1, 4.1, 4.1.1, 4.1.2, 4.1.3, 4.1.4, 4.1.5, 4.1.6, 4.1.7, 4.1.8, 4.1.10, 4.1.11, 6.2.2, and all tables and figures referenced therein.	1, 2, 3, 4, 5, 6
Melinda Fischer	JEA	MF-1	Resume of Melinda Fischer	1, 2, 3, 4, 5, 6
Melinda Fischer	JEA	MF-2	2026 Ten-Year Site Plan	1, 2, 3, 4, 5, 6
Melinda Fischer	JEA	MF-3	Table of Large Load Assumptions	1, 3, 4, 6
Melinda Fischer	JEA	MF-4	Market Test RFP	2, 3 5, 6
Melinda Fischer	JEA	MF-5	Tables of Economic Results and Scoring	2, 3, 5, 6
Melinda Fischer	JEA	MF-6	Table of Qualitative Evaluation	1, 2, 3, 4, 5, 6
Melinda Fischer	JEA	MF-7	Total RFP Scores	1, 2, 3, 4, 5, 6
Melinda Fischer	JEA	Revised JB-2	JEA Need Study (Rev. 1) Sections 1.4, 1.5, 3.2, 3.3.2, 3.3.2.1, 3.3.2.2, 3.3.2.3, 3.3.2.4, 3.3.2.5, 3.3.2.6, 3.3.2.7, 3.4, 4.1.9, 5.1, 5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.3.1, 5.2.3.2, 5.2.4, 5.2.5, 5.2.6, 5.2.7, 5.3, 5.4, 5.5, 6.0, 6.1, 6.2, 6.2.1, 6.2.3, 6.3, and all tables and figures referenced therein.	1, 2, 3, 4, 5, 6
Hua Fang	JEA	HF-1	Resume of Hua Fang	4, 5
Hua Fang	JEA	Revised HF-2	Base Fuel Price Assumptions	4, 5
Hua Fang	JEA	Revised HF-3	High and Low Fuel Price Assumptions	4, 5
Hua Fang	JEA	Revised JB-2	JEA Need Study (Rev. 1) Section 6.4.5 and Tables 6-3 and 6-4	4, 5
Matt Oakes	JEA	MO-1	Resume of Matt Oakes	5

<u>Witness</u>	<u>Proffered By</u>	<u>Exhibit #</u>	<u>Description</u>	<u>Issue #</u>
Matt Oakes	JEA	Second Revised MO-2	Cost and Performance Assumptions for Generating Alternatives (natural gas generating alternatives)	5
Matt Oakes	JEA	Revised JB-2	JEA Need Study (Rev. 1) Section 6.4.4 and Table 6-2	5
Jim Herndon	JEA	JH-1	Resume of Jim Herndon	2, 5
Jim Herndon	JEA	JH-2	MPS for JEA (2024)	2, 5
Jim Herndon	JEA	JH-3	Update to MPS for JEA (2026)	2, 5
Jim Herndon	JEA	JB-2	JEA Need Study (Rev. 1) Section 7.2	2, 5
Brian Pippin	JEA	BP-1	Resume of Brian Pippin	2, 5
Brian Pippin	JEA	BP-2	JEA's DSM Goals 2025-2034	2, 5
Brian Pippin	JEA	Revised JB-2	JEA Need Study (Rev. 1) Sections 1.6, 7.0, 7.1.1, and 7.1.2, and all tables and figures referenced therein.	2, 5
Bradley Kushner	JEA	BK-1	Resume of Bradley E. Kushner	1, 2, 3, 4, 5, 6, 7
Bradley Kushner	JEA	Revised BK-2	Modeling Results Table	2, 3, 5, 6
Bradley Kushner	JEA	Second Revised MO-2	Cost and Performance Assumptions for Generating Alternatives (solar, battery energy storage, and small modular reactor alternatives)	2, 5
Bradley Kushner	JEA	Revised JB-2	JEA Need Study (Rev. 1) Sections 6.4, 6.4.1, 6.4.2.1, 6.4.3, 6.4.6, 6.4.7, 6.4.7.1, 6.4.7.2, 6.5, and all tables and figures referenced therein.	2, 3, 5, 6
Wayne Oliver	JEA	WO-1	Resume of Wayne Oliver	3, 5, 6
Wayne Oliver	JEA	WO-2	Independent Evaluation Report	3, 5, 6

In addition to the above pre-filed exhibits, JEA reserves the right to introduce all or part of depositions at hearing for any purpose other than impeachment in accordance with the procedure set forth in Section VI.H of the Order Establishing Procedure (Order No. PSC-2026-0213-PCO-EM). JEA also reserves the right to utilize any exhibit introduced by any party and the right to

introduce any additional exhibit necessary for rebuttal, cross-examination or impeachment at the final hearing.

3. Statement of Basic Position

JEA:

The Commission should grant the petition for determination of need for St. Johns River Power Park (SJRPP) Unit 3 because the analysis presented in the pre-filed testimony and exhibits of JEA's witnesses demonstrate that the proposed combined cycle facility is needed to meet the electrical demand of JEA's customers and otherwise favorably addresses all of the factors set forth in section 403.519, Florida Statutes. JEA's analyses demonstrate that SJRPP Unit 3 with an in-service date of January 1, 2031, is the most cost-effective and system beneficial alternative to meet JEA's capacity needs, while providing for more efficient use of natural gas, increasing fuel diversity, reducing CO₂ emissions, enhancing flexibility and reliability, relieving power import strains on JEA's electric transmission system, and helping to avoid costly updates that would otherwise be necessary to extend the life of JEA's existing Northside Generating Station (NGS) Unit 3.

Based on its continuing evaluation and assessment of its resource portfolio against its load forecast and reliability criteria, JEA projects a need for an additional 72 MW in the 2031 timeframe, increasing to 222 MW in 2033 and 802 MW in 2035, to ensure a reliable long-term energy supply for JEA's customers. This projected need results primarily from increased demand during the winter and summer peaks, organic load growth in both the residential and commercial/industrial sectors, and planned unit retirement. The demand-side management (DSM) and conservation savings actually and estimated to be achieved by JEA and its customers through its Commission-approved DSM plan pursuant to the Florida Energy Efficiency and Conservation Act (FEECA), section 366.82, Florida Statutes, as well as other DSM programs, are reflected in JEA's load forecast, yet JEA still has a growing need. There are no additional cost-effective DSM or conservation measures reasonably available to offset JEA's need.

JEA's Board unanimously approved moving forward with developing SJRPP Unit 3 following JEA's thorough evaluation of generating and non-generating alternatives to meet its needs, including renewable resources and DSM options. As part of this analysis, JEA initiated a highly transparent, competitive solicitation for firm, fully dispatchable capacity. JEA conducted an extensive multi-phase economic and qualitative evaluation of the proposals received, as well as JEA's own self-build resource, monitored and confirmed by an independent evaluator. The self-build resource – a one-on-one (1 x 1) natural gas- and fuel-oil fired combined cycle unit – was the most cost-effective alternative, and also highest ranked in terms of system benefits related to dispatch, flexibility, and reliability. SJRPP Unit 3 would result in savings of approximately \$92 million in cumulative present worth cost (CPWC) over the next least cost alternative. Importantly, the next least cost alternative would include constructing a 1 x 1 combined cycle facility (like SJRPP Unit 3) in 2035. The economic cost of even a one-year delay of SJRPP Unit 3 is approximately \$20 million in CPWC. SJRPP Unit 3 is the most cost-effective and system beneficial option to meet the needs of JEA and its customers.

4. Issues and Positions

Petitioners' positions on the issues identified in this proceeding are as follows:

ISSUE 1: **Is there a need for the proposed St. Johns River Power Park Unit 3, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519(3), Florida Statutes?**

JEA: Yes. JEA's power supply planning process begins with the development of its forecast of peak demand and net energy to load (NEL) based on customer growth, historical energy sales and weather data. JEA's peak demand forecast, plus an additional 15 percent reserve margin, is utilized to determine the need for additional resources. The DSM and conservation savings achieved and estimated to be achieved by JEA and its customers through its FEECA DSM plan and other conservation efforts are reflected in JEA's load forecast, yet JEA still has a growing need. JEA's required reserve margin is projected to fall below the 15 percent reserve margin beginning in the winter of 2028 with increasing capacity requirements thereafter. Based on JEA's current forecasted winter demand, JEA has a need for 72 MW in 2031, increasing to 222 MW in 2033 and 802 MW in 2035. SJRPP Unit 3 will provide 678 MW (net; winter) of capacity starting in January 2031 to meet this need (additional off-system purchases can be made to maintain the target reserve margin until 2031). SJRPP Unit 3 will also increase fuel diversity, allow for more efficient use of natural gas, reduce CO₂ emissions, enhance flexibility and reliability, enhance grid reliability, and help to avoid approximately \$834.1 million in updates that would otherwise be necessary to extend the life of JEA's existing NGS Unit 3. (Brooks, Stancin, Fischer, Kushner).

ISSUE 2: **Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to JEA, which might mitigate the need for the proposed St. Johns River Power Park Unit 3?**

JEA: No. JEA has faced substantial challenges expanding renewable technologies within its service territory and regulatory changes have impacted their affordability. Additional renewable technologies and energy storage as alternatives to SJRPP Unit 3 were considered in the evaluation of generating alternatives and were evaluated as potential resources that would be added if doing so was part of the overall most cost-effective resource plan to meet demand. The results show that the addition of renewable energy resources would not be cost-effective relative to SJRPP Unit 3.

The DSM and conservation savings achieved and estimated to be achieved by JEA and its customers are reflected in JEA's load forecast at a level approximately two times JEA's Commission-approved numeric conservation goals. JEA will still need 72 MW of additional capacity in 2031, increasing to 222 MW in 2033 and 802

MW in 2035. To mitigate the need for SJRPP Unit 3, JEA would need to achieve more than 30 times the amount of DSM reflected in JEA's current goals for 2031, and 46 times the amount of DSM JEA achieved in 2025 (winter). JEA updated its analysis of potential DSM resources from that presented to the Commission in support of its FEECA goal setting in 2024. This updated analysis, coupled with JEA's own analyses and ongoing efforts, demonstrates that cost-effective DSM or conservation measures are not reasonably available to JEA to mitigate the need for SJRPP Unit 3. (Brooks, Fischer, Pippin, Herndon, Kushner)

ISSUE 3: **Is there a need for the proposed St. Johns River Power Park Unit 3, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519(3), Florida Statutes?**

JEA: Yes. SJRPP Unit 3 will be a highly efficient, state-of-the art combined cycle facility that will allow for more efficient use of natural gas, reduce system CO₂ emissions, and help avoid costly updates that would otherwise be necessary to extend the life of JEA's existing NGS Unit 3. Locating SJRPP Unit 3 on a parcel formerly utilized for electric generation will allow for use of existing infrastructure, allow power to be transported via existing 230-kV transmission lines, and significantly minimize overall environmental impacts as compared to locating new generation on a greenfield site—all providing substantial benefits to JEA's customers.

Based on a competitive market process following JEA's issuance of a request for proposals (RFP), consideration of system benefits and risks, and extensive economic modeling, the resource plan that includes SJRPP Unit 3 coming into service in January 2031, is the most cost-effective alternative for meeting JEA's capacity needs, resulting in a CPWC savings of approximately \$92 million as compared to the next lowest cost alternative. (Brooks, Fischer, Stancin, Kushner, Oliver)

ISSUE 4: **Is there a need for the proposed St. Johns River Power Park Unit 3, taking into account the need for fuel diversity and supply reliability, as this criterion is used in Section 403.519(3), Florida Statutes?**

JEA: Yes. SJRPP Unit 3 will provide reliable dispatchable power, allow for more efficient use of natural gas, reduce system CO₂ emissions, provide support to reliably integrate the import of power into the JEA system, and enhance flexibility and reliability. The output of SJRPP Unit 3 will displace all gas-fired energy currently produced by NGS Unit 3, utilizing 37% less gas per MWh. This efficiency reduces JEA's aggregate gas requirement to serve the same load and will result in a reduction of 0.22 tons of CO₂ per MWh. SJRPP Unit 3 also has dual-fuel capability (natural gas or fuel oil), which enhances fuel supply resilience and overall efficiency by moderating exposure to gas price volatility and supporting a

more balanced and reliable generation mix. (Brooks, Stancin, Fischer, Fang Kushner)

ISSUE 5: **Will the proposed St. Johns River Power Park Unit 3 provide the most cost-effective alternative available, as this criterion is used in Section 403.519(3), Florida Statutes?**

JEA: Yes. SJRPP Unit 3 is the most cost-effective alternative to meet the needs of JEA's customers. Based on a competitive market process following JEA's issuance of a RFP overseen by an independent evaluator and extensive economic modeling, the resource plan that includes SJRPP Unit 3 coming into service in January 2031, is the most cost-effective alternative to meet JEA's capacity needs, resulting in a CPWC savings of approximately \$92 million as compared to the next lowest cost alternative. Importantly, the next lowest cost alternative would include the addition of an advanced class combined cycle unit (like SJRPP Unit 3) in 2035. Thus, the next lowest cost alternative would still include the addition of combined cycle technology in the relatively near-term, essentially reflecting a 4-year delay in the addition of the proposed SJRPP Unit 3. (All JEA witnesses)

ISSUE 6: **Based on the resolution of the foregoing issues and other matters within its jurisdiction which it deems relevant, should the Commission grant JEA's petition to determine the need for the proposed St. Johns River Power Park Unit 3?**

JEA: Yes. The analyses and other information presented in the testimony of JEA's witnesses demonstrate that an affirmative need determination is warranted for SJRPP Unit 3 based on consideration of the relevant factors set forth in section 403.519, Florida Statutes. JEA will have a need for 72 MW in 2031, increasing to 222 MW in 2033 and 802 MW in 2035. The proposed SJRPP Unit 3 will ensure that JEA has an adequate supply of power to serve its customers' needs at a reasonable cost. The competitive RFP process overseen by an independent evaluator; extensive economic analyses of various technologies, including renewable technologies; and consideration of system risks and benefits; demonstrate that SJRPP Unit 3 is the most cost-effective, system-beneficial alternative to meet JEA's power supply needs. SJRPP Unit 3 will improve system reliability, fuel diversity, and operational flexibility while avoiding substantial and costly system upgrades and reducing emissions. JEA implements DSM programs pursuant to its Commission-approved DSM plan, along with additional conservation efforts, all of which are accounted for in JEA's projected need. Additional cost-effective conservation measures are not available to mitigate the need for SJRPP Unit 3. (All JEA witnesses)

ISSUE 7: **Should this docket be closed?**

JEA: Yes. Upon issuance of a final order granting JEA's petition for need determination for SJRPP Unit 3, Docket No. 20260087-EM should be closed.

5. **Stipulated Issues:** JEA is not party to any stipulations at this time.

6. **Pending Motions:** None at this time.

7. **Pending Requests for Confidentiality:**

JEA's Request for Confidential Classification of information provided in response to Staff's First Set of Interrogatories, filed July 7, 2026.

8. **Objections to Qualifications:**

JEA: None at this time.

9. **Sequestration of Witnesses:** JEA does not request sequestration of any witnesses.

10. **Requirements of Order:** JEA believes that this Prehearing Statement complies with all the requirements of the Order Establishing Procedure.

Respectfully submitted this 28th day of July 2026.

Stearns Weaver Miller
Weissler Alhadeff & Sitterson, P.A.

/s/ Brooke E. Humphrey
Brooke E. Humphrey
Florida Bar No. 710881
Matthew E.W. Bryant
Florida Bar No. 93190
BHumphrey@stearnsweaver.com
MBryant@stearnsweaver.com
106 E. College Ave., Suite 700
Tallahassee, Florida 32301
(850) 580-7200

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on this 28th day of July 2026 via Electronic Mail to the following:

Shaw P. Stiller
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399-7019
sstiller@psc.state.fl.us

Alisha Hixon
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399-7019
ahixon@psc.state.fl.us
discovery-gcl@psc.state.fl.us

/s/ Brooke E. Humphrey

Brooke E. Humphrey
Florida Bar No. 710881