



August 11, 2021

## VIA ELECTRONIC FILING

Adam Teitzman, Commission Clerk Division of the Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Re: Docket No. 20210015-EI

Petition by FPL for Bate Rate Increase and Rate Unification

Dear Mr. Teitzman:

Attached for filing on behalf of the CLEO Institute and Vote Solar in the above-referenced docket is a Motion to Excuse from In-Person Hearing for Expert Witnesses Curt Volkmann and Rachel Wilson.

Thank you for your assistance in this matter. Please let me know if you should have questions regarding this submission.

Sincerely,

Katie Chiles Ottenweller Attorney for Vote Solar 838 Barton Woods Road NE Atlanta, GA 30307 (706)224-8017

katie@votesolar.org

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida

**Power and Light Company** 

**DOCKET NO. 20210015-EI** 

**Filed: August 11, 2021** 

THE CLEO INSTITUTE AND VOTE SOLAR'S

MOTION TO EXCUSE CURT VOLKMANN AND RACHEL WILSON FROM INPERSON HEARING AND REQUEST TO APPEAR VIRTUALLY

The CLEO Institute and Vote Solar hereby move the Florida Public Service Commission ("Commission") for leave to excuse expert witnesses Curt Volkmann and Rachel Wilson from the obligation to appear in person at the upcoming hearing scheduled to commence on August 16, 2021, or at such other time that said hearing may be re-scheduled by the Commission.

In order to attend the hearing in person, Mr. Curt Volkmann would be required to travel from Fontana, Wisconsin, involving multiple plane flights. He has not flown since January 2020 due to concerns about COVID and risks to himself (being over 55 years old) and to his family. Due to the increased spread of the Delta variant, and the growing number of breakthrough COVID infections, he is requesting the ability to appear remotely to give a summary of his testimony and be available to answer any questions of intervenors or the Commission. FPL has informed counsel for The CLEO Institute and Vote Solar that the Company does not intend to ask Mr. Volkmann any questions at the hearing.

In order to attend the hearing in person, Ms. Rachel Wilson would be traveling from Boston, Massachusetts, involving multiple plane flights. Ms. Wilson is vaccinated, but she has three young children at home who are unable to be vaccinated, creating higher risk of them

contracting COVID-19. She is requesting the ability to appear remotely to give a summary of her testimony and be available to answer any questions that other intervenors or the Commission may

have. FPL has informed counsel for The CLEO Institute and Vote Solar that the Company does

not intend to ask Ms. Wilson any questions at the hearing.

Undersigned attempted to confer with counsel for the parties. As of the filing of this

motion, no party indicated opposition. Counsel for FAIR, Florida Rising, ECOSWF, LULAC, and

the Larsons indicated support for the motion. Counsel for FPL and FIPUG expressed no objection

to the motion. The Office of Public Counsel takes no position on the motion. As of 4:30 p.m. on

the day of filing, neither FRF, FEA, FIT, nor WalMart had responded.

WHEREFORE, The CLEO Institute and Vote Solar respectfully request that the

Commission enter an order excusing Mr. Volkmann and Ms. Wilson from in-person appearances,

and permitting them to appear virtually at the upcoming hearing.

Respectfully submitted this 11<sup>th</sup> day of August, 2021.

/s/ Katie Chiles Ottenweller

Southeast Director Vote Solar 838 Barton Woods Road Atlanta, GA 30307

Email: <u>katie@votesolar.org</u>

Phone: 706.224.8107

Attorney for Vote Solar

William C. Garner Law Office of William C. Garner, PLLC 3425 Bannerman Road Unit 105, #414 Tallahassee, FL 32312

Email: bgarner@wcglawoffice.com

Phone: 850.328.5478

Attorney for The CLEO Institute Inc.

## CERTIFICATE OF SERVICE Docket No. 20210015-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 11<sup>th</sup> day of August, 2021, to the following:

Florida Power & Light Company Ken Hoffman 134 West Jefferson Street Tallahassee FL 32301-1713 ken.hoffman@fpl.com	Florida Power & Light Company Wade Litchfield/John Burnett/Maria Moncada 700 Universe Boulevard Juno Beach FL 33408-0420 wade.litchfield@fpl.com john.t.burnett@fpl.com maria.moncada@fpl.com
Bianca Lherisson/Jennifer Crawford/ Shaw Stiller/Suzanne Brownless Public Service Commission Office of General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 BLheriss@psc.state.fl.us jcrawfor@psc.state.fl.us sstiller@psc.state.fl.us sbrownl@psc.state.fl.us	Gulf Power Company Russell A. Badders One Energy Place Pensacola FL 32520-0100 Russell.Badders@nexteraenergy.com
Jon C. Moyle, Jr./Karen Putnal/Ian Waldick Florida Industrial Power Users Group 118 N. Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com kputnal@moylelaw.com iwaldick@moylelaw.com	T. Jernigan/Maj. H. Buchanan/Capt. R. Friedman/TSgt. A. Braxton/E. Payton 139 Barnes Drive, Suite 1 Tyndall AFB FL 32403 Ebony.payton.ctr@us.af.mil Thomas.jernigan.3@us.af.mil ULFSC.Tyndall@us.af.mil Holly.buchanan.1@us.af.mil Robert.Friedman.5@us.af.mil Arnold.braxton@us.af.mil

Bradley Marshall/Jordan Luebkemann Earthjustice 111 S. Martin Luther King Jr. Blvd. Tallahassee, Florida 32301 bmarshall@earthjustice.org jluebkemann@earthjustice.org	George Cavros Southern Alliance for Clean Energy 120 E. Oakland Park Blvd., Suite 105 Fort Lauderdale, FL 33334 george@cavros-law.com
James Brew/Laura Baker/Joseph Briscar 1025 Thomas Jefferson St., NW, Ste. 800 W Washington, DC. 20007 jbrew@smxblaw.com jwb@smxblaw.com jrb@smxblaw.com	Office of the Public Counsel Charles Rehwinkel Patty Christensen 111 W. Madison Street, Room 812 Tallahassee FL 32399 (850) 488-9330 rehwinkel.charles@leg.state.fl.us Christensen.patty@leg.state.fl.us
Nathan A. Skop, Esq. 420 NW 50th Blvd. Gainesville, FL 32607 n_skop@hotmail.com	Stephanie U. Eaton Barry A. Naum SPILMAN THOMAS & BATTLE, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NC 27103 Phone: (336) 631-1062 seaton@spilmanlaw.com bnaum@spilmanlaw.com
Robert Scheffel Wright John T. LaVia, III Gardner, Bist, Bowden, Dee, LaVia, Wright & Perry, P.A. 1300 Thomaswood Drive Tallahassee, Florida 32308 Telephone (850) 385-0070 schef@gbwlegal.com jlavia@gbwlegal.com	Floyd R. Self, B.C.S. Berger Singerman, LLP 313 North Monroe Street, Suite 301 Tallahassee, FL 32301 fself@bergersingerman.com  T. Scott Thompson, Esq. Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. 555 12th Street NW, Suite 1100 Washington, DC 20004 SThompson@mintz.com

/s/ Katie Chiles Ottenweller Attorney for Vote Solar