

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission Review of Numeric
Conservation Goals (Florida Power & Light
Company)

Docket No: 20240012-EG

Filed: July 9, 2024

**FLORIDA POWER & LIGHT COMPANY’S
PREHEARING STATEMENT**

Florida Power & Light Company (“FPL”), by and through its undersigned counsel, hereby submits this Prehearing Statement pursuant to Order Nos. PSC-2024-0022-PHO-EG, PSC-2024-0157-PCO-EG, and PSC-2024-0159-PCO-EG, and states:

1. FPL WITNESSES

A. Direct Testimony

<u>Witness</u>	<u>Subject Matter</u>	<u>Issue #</u>
John F. Floyd	<ul style="list-style-type: none"> Provides an overview of FPL’s historical Demand-Side Management (DSM) participation and achievements. Explains the factors that impact potential DSM Goals, including cost-effectiveness and Codes and Standards. Provides an overview of the process and analyses performed to develop FPL’s proposed DSM Goals and potential programs for the period 2025-2034. Explains how FPL addressed free ridership in developing the proposed DSM Goals. Describes the programs that pass the Rate Impact Measure (RIM) and Participant test scenario and the programs that pass the Total Resource Cost (TRC) and Participant test scenario, together with the projected savings, participants, costs, and rate impacts for each scenario. Describes FPL’s proposed DSM Goals and programs for the period 2025-2034, together with the projected savings, participants, costs, and rate impacts associated with FPL’s proposed goals and programs. 	2-5, 7-13
Andrew W. Whitley	<ul style="list-style-type: none"> Describes FPL’s resource planning process and the six-step process used for developing DSM Goals. Describes the process and assumptions used to project FPL’s resource needs, including the selection of the unit to be considered potentially avoidable for the preliminary DSM screening work. Describes the economic screening tests used to develop FPL’s DSM Goals, the results if each test, and the additional sensitivity case screening analyses of the DSM measures. 	3-7, 12-13

	<ul style="list-style-type: none"> • Describes the development of the Supply Only Resource Plan, the RIM Resource Plan, the TRC Resource Plan, and the FPL Proposed Resource Plan. • Describes the economic analyses of the four resource plans, including comparisons of the Levelized System Average Electric Rate, electric rates, and customer bills, and the results of the non-economic analysis of each plan. • Identifies the DSM Goals under the FPL Proposed Resource Plan and explains why they are reasonable from a resource planning perspective. 	
Jim Herndon	<ul style="list-style-type: none"> • Summarizes and sponsors the Market Potential Study conducted for FPL, which includes the Technical Potential for FPL. • Provides an assessment of Technical Potential, the resulting measures list, and measure adoption estimates. 	1

C. Rebuttal Testimony

<u>Witness</u>	<u>Subject Matter</u>	<u>Issue #</u>
John F. Floyd	<ul style="list-style-type: none"> • Addresses certain assertions and proposals made by Florida Rising, Environmental Coalition of Southwest Florida, and League of United Latin American Citizens (collectively, “FEL”). • Rebutts FEL’s proposed costly and unsupported expansions of FPL’s Low Income program, Residential Air Conditioning program, Low Income Renter Pilot, and subsequent residential goals. • Rebutts FEL’s recommendation to modify the credit levels for the Commercial/Industrial Load Control (CILC) and Commercial/Industrial Demand Reduction (CDR) programs. 	2-5, 7-9
Andrew W. Whitley	<ul style="list-style-type: none"> • Addresses certain assertions and proposals made by FEL. • Addresses the deficiencies in FEL’s testimony regarding the process for evaluating DSM, both in terms of cost-effectiveness analyses and in how DSM fits into the resource planning process. • Describes the rate impact of FEL’s proposed goals for FPL, which shows FEL’s proposals would increase the rates of all FPL’s customers. 	3-5, 7

2. EXHIBITS

<u>Witness</u>	<u>Proffered By</u>	<u>Exhibit #</u>	<u>Description</u>	<u>Issue #</u>
Direct				
John F. Floyd	FPL	JNF-1	Historical DSM Participation and Achievements	2

	FPL	JNF-2	Current DSM Programs and Associated Measures	2
	FPL	JNF-3	List of Measures Evaluated for Technical Potential	1
	FPL	JNF-4	2025-2034 Goals Scenarios and Potential Programs	1-10, 12-13
	FPL	JNF-5	Comparison of Current Programs to Proposed Programs	2
Andrew W. Whitley	FPL	AWW-1	Economic Elements Accounted for in DSM Preliminary Screening Tests: Benefits & Costs	3-5
	FPL	AWW-2	Summary Results of Preliminary Economic Screening of Individual DSM Measures	3-6
	FPL	AWW-3	Summary Results of Preliminary Economic Screening of Individual DSM Measures: Sensitivity Cases	3-7
	FPL	AWW-4	Forecasted Fuel and Environmental Compliance Costs	6
	FPL	AWW-5	Projection of FPL's Resource Needs for 2024 - 2035 with No Incremental DSM Signups After 2024	12-13
	FPL	AWW-6	Comparison of DSM Reasonably Achievable Summer MW Values with FPL's Projected Summer Resource Needs	12-13
	FPL	AWW-7	Overview of Supply Only and With DSM Resource Plans	12-13
	FPL	AWW-8	Levelized System Average Electric Rate Calculation for the Supply Only Resource Plan	3-6, 12-13
	FPL	AWW-9	Levelized System Average Electric Rate Calculation for the RIM Resource Plan	3-6, 12-13
	FPL	AWW-10	Levelized System Average Electric Rate Calculation for the FPL Proposed Resource Plan	3-6, 12-13
	FPL	AWW-11	Levelized System Average Electric Rate Calculation for the TRC Resource Plan	3-6, 12-13
	FPL	AWW-12	Comparison of the Resource Plans: Economic Analyses Results	3-6, 12-13
	FPL	AWW-13	Additional Cost Needed to be Added to the RIM Plan to Increase its Levelized System Average Electric Rate to That of the TRC Plan	3-6, 12-13

	FPL	AWW-14	Additional Cost Needed to be Added to the FPL Proposed Plan to Increase its Levelized System Average Electric Rate to That of the TRC Plan	3-6, 12-13
	FPL	AWW-15	Comparison of the Resource Plans: Projection of System Average Electric Rates and Customer Bills (Assuming 1,000 kWh Usage)	3-6, 12-13
	FPL	AWW-16	Comparison of the Resource Plans: Projection of System Emissions	6
	FPL	AWW-17	Comparison of the Resource Plans: Projection of System Oil and Natural Gas Usage	6
	FPL	AWW-18	FEL Plan Analysis: Levelized System Average Electric Rate	3-6, 12-13
Jim Herndon	FPL	JH-1	Herndon Background and Qualifications	1
	FPL	JH-2	TPS for Florida Power Light & Light Company	1
	FPL	JH-8	2024 Measure List	1
	FPL	JH-9	Comparison of Comprehensive 2019 Measure Lists to the 2024 Comprehensive Measure Lists	1
Rebuttal				
John F. Floyd	FPL	JNF-6	Revised Low Income Program Savings	9
	FPL	JNF-7	HVAC Incremental Measure Costs	10
Andrew W. Whitley	FPL	AWW-19	FEL Plan Analysis: Comparison of Levelized System Average Electric Rates	3-6, 12-13
	FPL	AWW-20	FEL Plan Analysis: Additional Cost Needed to be Added to FPL's Proposed Plan to Increase its Levelized System Average Electric Rate to That of FEL Plan Analysis	3-6, 12-13
	FPL	AWW-21	FEL Plan Analysis: Comparison of the Resource Plans: Projection of System Average Electric Rates and Customer Bills (Assuming 1,000 kWh Usage)	3-6, 12-13

In addition to the above pre-filed exhibits, FPL reserves the right to utilize any exhibit introduced by any other party. FPL additionally reserves the right to introduce any additional exhibit necessary for cross-examination or impeachment at the final hearing.

3. STATEMENT OF BASIC POSITION

Pursuant to the Florida Energy Efficiency and Conservation Act (FEECA) and Rules 25-17.001, 25-17.0021, and 25-17.008, Florida Administrative Code, FPL has proposed numeric conservation Goals for reasonably achievable demand savings and annual energy savings for the next ten years. As required by Rule 25-17.0021(3), FPL's proposed DSM Goals are based upon FPL's most recent planning process, used both the Participant and RIM test scenario and the Participant and TRC test scenario, and considered the effects of free riders and building codes and appliance efficiency standards.

FPL followed a rigorous, six-step analytical process similar to the process it has used in past DSM Goal-setting proceedings to develop its DSM Goals. FPL's analyses demonstrate that FPL's proposed DSM Goals are 419 megawatts (MW) Summer demand, 326 MW Winter demand, and 931 gigawatt-hours (GWh) energy reduction are reasonable and appropriate for serving FPL's customers for the 2025-2034 DSM Goals period.

After careful analysis, FPL recommends goals for the period 2025-2034 that reflect continuation of its current portfolio of energy-efficiency and load-management programs, expansion of the existing low-income weatherization program, and introduction of a new low-income Renter Pilot. FPL's proposal also includes expansion of the On Call[®] load-management program with a new "HVAC On-Bill Option." This new option expands the On Call[®] load-management program, which has been approved by the Commission and been in place since 1986,

to allow greater customer access to new energy-saving HVAC equipment in a way that also passes the RIM cost-effectiveness test. Under this program, a customer will receive a new efficient HVAC unit that FPL will have the ability to control in peak demand situations. Collectively, FPL's proposed DSM programs focus on the highest priorities of weather-sensitive peak demand, continue to provide customer incentives for making energy-efficient investments, and can be delivered with little to no incremental bill impact to customers.

FEL was the only party to take a position on FPL's proposed 2025-2034 DSM Goals. FEL opposes the use of the two-year-payback screening criterion but does not offer an alternative method to screen the impacts of free riders as required by Rule 25-17.0021(3). The two-year payback criterion is a reasonable mechanism previously approved by the Commission to screen out measures that already have a reasonable economic payback without any DSM incentive.

FEL recommends expanding FPL's low-income programs to match Tampa Electric Company's (TECO) proposals on a per-capita basis – specifically, reaching 6.92 times as many low-income customers as TECO. FEL also recommends increasing FPL's residential HVAC program enrollment target to 150,000 customers per year. FEL questions the proposed cap on the incentive to be available under FPL's proposed Low Income Renter Pilot, and whether the costs of the upgraded appliance will be shifted from the landlord to the tenant. Finally, FEL proposes that the credits for the CILC and CDR programs be cut by at least half. The Commission previously determined that these credits would be addressed in FPL's next base rate case (per FPL's Commission-approved 2021 Settlement Agreement).

FEL's recommendations are not based on any assessment of the technical potential of energy-efficiency measures, any cost-effectiveness analyses, nor any cost, rate, or bill impact analyses. FEL's proposals are not consistent with Commission's DSM Goals rules and overlook

that this is not the appropriate proceeding to reset the CILC and CDR credits due to FPL's approved 2021 base rate case settlement. Moreover, FEL's proposals would result in significant rate impacts to all of FPL's customers, including low-income customers, renters, and customers who are unable to participate in DSM programs. For these reasons, as further explained in FPL's rebuttal testimonies and exhibits, FEL's recommendations should be rejected.

For all the reasons discussed above, and as explained in more detail in the direct and rebuttal testimony provided by its witnesses, FPL's proposed DSM Goals should be approved. FPL's proposal complies with the requirements of Section 366.82, Florida Statutes, complies with Rules 25-17.0021 and 25-17.008, Florida Administrative Code, and will establish DSM goals at a reasonable and appropriate level given current projections of FPL system costs while continuing to maintain low electric rates for all FPL customers.

4. STATEMENT OF ISSUES AND POSITIONS

Issue No. 1: Are the utility's proposed goals based on an adequate assessment of the full technical potential of all available demand-side and supply-side conservation and efficiency measures, including demand-side renewable energy systems?

FPL Position: Yes. An outside consultant, Resource Innovations, Inc., performed the Technical Potential Study for each of the FEECA Utilities. The analysis required extensive iterative work and continuous collaboration to ensure that it was comprehensive and resulted in a thorough and wide-ranging reassessment of conservation and efficiency measures. (*FPL witness Herndon*)

Issue No. 2: Are the utility's proposed goals based on savings reasonably achievable through demand-side management programs over a ten year period?

FPL Position: Yes. FPL's proposed DSM Goals include the following RIM- and TRC-passing programs:

Residential Sector:

1. Residential HVAC
2. Residential Ceiling Insulation
3. Residential Low Income
 - a. Renter Pilot
4. Residential New Construction (BuildSmart[®])
5. Residential Load Management (On Call[®]) with new HVAC on-bill option

Commercial/Industrial Sector:

1. Business HVAC
2. Business Lighting
3. Commercial/Industrial Demand Reduction
4. Business Custom Incentive
5. Business On Call[®]

This proposal of RIM- and TRC-passing programs will allow FPL to continue delivering meaningful energy-efficiency savings options to all customers including owners, renters, and low-income customers. The proposed goals factor in adjustments in participation levels to reflect market conditions and adjustments in projections based on the 2024 Technical Potential Study measure impacts. (*FPL witness Floyd*)

Issue No. 3: Do the utility's proposed goals adequately reflect the costs and benefits to customers participating?

FPL Position: Yes. Consistent with Rule 25-17.0021(3), Florida Administrative Code, FPL's proposed DSM Goals were developed using both the Participant and RIM cost-effectiveness tests scenario and the Participant and TRC cost-effectiveness tests scenario. The intent of the Participant test is to measure the cost-effectiveness of a DSM measure from the participating customer's perspective. This test reflects the costs and benefits to participating customers. The intent of the TRC test is to measure the cost of a DSM measure to both the utility and its customers, without consideration of the impact to rates. Specifically, the TRC test only considers the incremental cost of the measure (equipment) and the administrative cost of implementing the program. (*FPL witnesses Floyd and Whitley*)

Issue No. 4: Do the utility's proposed goals adequately reflect the costs and benefits to the general body of rate payers as a whole, including utility incentives and participant contributions?

FPL Position: Yes. Consistent with Rule 25-17.0021(3), Florida Administrative Code, FPL's proposed DSM Goals were developed using both the Participant and RIM cost-effectiveness tests scenario and the Participant and TRC cost-effectiveness tests scenario. The intent of the TRC test is to measure the cost-effectiveness of a DSM measure to both the utility and its customers, without consideration of the impact to rates. The RIM test includes consideration of the cost of incentives paid to participating customers, the revenue impact on the general body of ratepayers resulting from the DSM program, and the cost of implementing the program itself (administrative cost). (*FPL witnesses Floyd and Whitley*)

Issue No. 5: Do the utility’s proposed goals adequately reflect the need for incentives to promote both customer-owned and utility-owned energy efficiency and demand-side renewable energy systems?

FPL Position: Yes. Cost-effective incentives for participating customers are reflected in FPL’s proposed DSM Goals because they are included and considered in the Participant and RIM screening tests and the Participant and TRC screening tests required by Rule 25-17.0021(3), Florida Administrative Code. There is no need to establish incentives for utilities in this proceeding. (*FPL witnesses Floyd and Whitley*)

Issue No. 6: Do the utility’s proposed goals adequately reflect the costs imposed by state and federal regulations on the emissions of greenhouse gases?

FPL Position: Yes. Consistent with the direction provided in the Order Establishing Procedure for this docket (Order No. PSC-2024-0022-PCO-EG), FPL did not account for projected CO₂ compliance costs in these screening tests. Rather, because FPL considers CO₂ compliance costs in all of its other resource planning analyses, FPL analyzed the impact of projected CO₂ compliance costs in a sensitivity screening analysis, which are reflected in Exhibit AWW-3. (*FPL witness Whitley*)

Issue No. 7: Do the utility’s proposed goals appropriately reflect consideration of free riders?

FPL Position: Yes. FPL’s proposed Goals reflect consideration of free riders, as required by Rule 25-17.0021(3), Florida Administrative Code. FPL utilized the two-year payback screening criterion to minimize the impact of “free riders.” The two-year payback criterion is a reasonable mechanism previously approved by the Commission to screen out measures with a short payback that, by including in a DSM program, would result in unnecessary

expense for all customers as these measures already have a reasonable economic payback. However, FPL's proposed Low Income program does include measures with less than a two-year payback, as FPL recognizes that low-income customers may not have the financial resources to make energy-efficiency investments regardless of the payback period. (*FPL witnesses Floyd and Whitley*)

Issue No. 8: Should demand credit rates for interruptible service, curtailable service, stand-by generation, or similar potential demand response programs be addressed in this proceeding or in the base rate proceedings for the rate regulated FEECA Utilities? If this proceeding, what demand credit rates are appropriate for purposes of establishing the utilities' goals?

FPL Position: For FPL, this is not the appropriate proceeding to reset the Commercial and Industrial Load Control (CILC) and Commercial Demand Response (CDR) credits for FPL's commercial and industrial demand response programs. The current CILC and CDR credits were set in FPL's 2021 Rate Case Settlement Agreement, which was approved by the Commission in Order Nos. PSC-2021-0446-S-EI, PSC-2021-0446A-S-EI and PSC-2024-0078-FOF-EI. Importantly, Paragraph 4(e) of the FPL 2021 Base Rate Case Settlement provides, in pertinent part, that the CILC and CDR credits are to be reset in a general base rate proceeding. (*FPL witness Floyd*)

Issue No. 9: Should the savings associated with FPL's Residential Low Income Renter Pilot program be included in its conservation goals?

FPL Position: Yes. FPL's Residential Low Income Renter Pilot program is a new DSM measure that allows low-income renters to receive the energy-saving benefit of more efficient HVAC equipment while keeping the landlord whole from a capital investment perspective. Under this new low-income program, FPL will pay the incremental cost of a

more efficient HVAC unit, up to \$1,000, such that a landlord replacing an HVAC unit for a tenant property will essentially pay the same cost for the more efficient HVAC unit as they would have for a less efficient/standard HVAC unit. This will eliminate the disincentive the landlord has to make an incremental investment in energy-efficient equipment while allowing the low-income renter to receive the benefit of the more efficient HVAC equipment on their energy consumption and electric bill. FPL is proposing to limit this program to three years with an annual cap of 500 participants in order to test and evaluate the effectiveness of this new program and determine if a similar low-income program should be offered in the future. (*FPL witness Floyd*)

Issue No. 10: Is FPL's proposed HVAC On-Bill option for its existing Residential On-Call program with its associated HVAC Services Agreement (proposed Tariff sheets 9.858 through 9.866) a regulated activity within the jurisdiction of the Commission? If not, should the savings associated with FPL's HVAC On-Bill option and HVAC Services Agreement be removed from its conservation goals?

FPL Position: Yes. FPL's proposed HVAC On-Bill option expands the existing On Call[®] load-management program to allow greater customer access to new energy-saving HVAC equipment in a way that also passes the RIM cost-effectiveness test. In direct support of FPL's production, transmission, and delivery of electric power to its customers, the voluntary HVAC On-Bill tariff program will provide interested customers with an opportunity to acquire a new, more energy-efficient HVAC unit for a fixed monthly charge, and FPL will have the ability to control that HVAC unit in peak demand situations with this load-control measure. The forecasted peak demand reductions arising from the On-Bill Program will be factored into the resource planning for FPL's generation system required to serve customers. *See* § 366.02(4), Fla. Stat. Consistent with the goals and

provisions of Sections 366.81 and 366.82, Florida Statutes, this proposed DSM program will focus on the highest priorities of weather-sensitive peak demand while also providing benefit to the general body of customers from the avoided capacity savings related to FPL retaining control of the HVAC equipment. This proposed regulated activity represents an efficiency investment across FPL's generation, transmission, and distribution as well as within its customer base. *(FPL witness Floyd)*

Issue No. 11: Should the Commission approve FPL's proposed plan to cap participation for non-RIM Test passing programs once sector-level goals are achieved?

FPL Position: Yes. FPL's proposed DSM Goals include both RIM- and TRC-passing programs, which will allow FPL to continue delivering meaningful energy-efficiency savings options to all customers including owners, renters, and low-income customers. RIM-passing programs result in the lowest rate impact, benefit all customers, and avoid cross-subsidization of participants by non-participants. TRC-passing measures can expose all utility customers, whether they participate in a DSM program or not, to higher electric rates. Thus, as an appropriate guardrail on such measures, FPL proposes to limit costs of non-RIM passing programs by capping participation once sector-level goals are met, which is consistent with FPL's last two Commission-approved DSM Plans. This limitation on participation would only apply to non-RIM-passing energy efficiency programs and provides a way to limit overall portfolio costs while still making valuable energy savings programs available to FPL customers. *(FPL witness Floyd)*

Issue No. 12: What residential and commercial/industrial summer and winter megawatt (MW) and annual Gigawatt-hour (GWh) goals should be established for the period 2025-2034?

FPL Position: The proposed DSM goals based on the FPL Proposed Resource Plan are 419 MW Summer demand, 326 MW Winter demand, and 931 GWh energy reduction for the period 2025 through 2034.

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Cumulative
Summer MW											
Residential	26.22	26.46	26.85	26.87	26.99	27.15	27.36	27.59	27.87	28.18	271.54
Commercial/Industrial	16.24	16.26	16.28	13.89	13.94	14.00	14.05	14.11	14.17	14.23	147.17
Total ¹	42.46	42.72	43.13	40.76	40.93	41.15	41.41	41.70	42.04	42.41	418.71
Winter MW											
Residential	20.76	21.65	22.75	23.15	23.62	24.12	24.66	25.24	25.85	26.51	238.32
Commercial/Industrial	9.65	9.68	9.71	8.28	8.33	8.38	8.43	8.48	8.54	8.59	88.06
Total ¹	30.42	31.34	32.46	31.43	31.94	32.50	33.09	33.72	34.39	35.10	326.38
Annual GWh											
Residential	43.71	43.00	42.39	41.42	40.99	40.65	40.38	40.18	40.03	39.93	412.68
Commercial/Industrial	48.40	49.13	49.87	50.60	51.37	52.15	52.95	53.76	54.58	55.42	518.24
Total ¹	92.11	92.13	92.26	92.02	92.37	92.81	93.33	93.94	94.61	95.35	930.93

⁽¹⁾ Totals may not add due to rounding.

(FPL witnesses Floyd and Whitley)

Issue No. 13: What goals are appropriate for increasing the development of demand-side renewable energy systems?

FPL Position: Goals of zero should be established for demand-side renewable energy systems because such systems are not cost-effective for FPL’s customers. In total, there were 9 unique demand-side renewable measures evaluated in the goals process. However, the demand-side renewable measures fail both the RIM and the TRC economic screening tests. Setting Goals at zero for demand-side renewable energy systems would be consistent with past Commission practice of setting DSM Goals at zero for FEECA Utilities when no demand-side renewable measures are cost-effective, but addressed through the Commission’s net metering program. A Goal level of zero would best protect the general

body of customers and minimize cross-subsidies between participants and non-participants. (*FPL witnesses Floyd and Whitley*)

5. STIPULATED ISSUES

FPL is not aware of any stipulated issues at this time. However, FPL remains willing and available to discuss settlement and/or stipulated facts and issues with the parties, including but not limited to stipulation of testimony and exhibits and waiver of cross-examination.

6. PENDING MOTIONS

As of the date of this filing, FPL is not aware of any motions that remain pending.

7. PENDING REQUESTS FOR CONFIDENTIALITY

As of the date of this filing, the following Requests for Confidential Classification remain pending:

- DN 06837-2024 filed June 21, 2024: Request for confidential classification of [DN 06838-2024] information provided in response to FL Rising, ECOSWF, and LULAC's 1st request for PODs (Nos. 1 and 2)
- DN 03340-2024 filed May 20, 2024: Request for confidential classification of [DN 03341-2024] information provided in response to Staff's 1st request for PODs (No. 2)

8. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

FPL has no objections to the qualifications of any witness at this time.

9. **REQUEST FOR SEQUESTRATION OF WITNESSES**

None at this time.

10. **STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE**

There are no requirements of the Order Establishing Procedure with which FPL cannot comply.

Respectfully submitted this 9th day of July 2024,

By: s/William p. Cox

William P. Cox, Senior Counsel

Fla. Bar No. 0093531

Christopher T. Wright, Managing Attorney

Fla. Auth. House Counsel No. 1007055

Florida Power & Light Company

700 Universe Boulevard

Juno Beach, Florida 33408-0420

Telephone: (561) 304-5662

Facsimile: (561) 691-7135

Email: will.p.cox@fpl.com

Email: christopher.wright@fpl.com

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 9th day of July 2024:

Jacob Imig
Jonathan Rubottom
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
jimig@psc.state.fl.us
jrubotto@psc.state.fl.us
discovery-gcl@psc.state.fl.us

Bradley Marshall
Jordan Luebke
EarthJustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, Florida 32301
bmarshall@earthjustice.org
jluebke@earthjustice.org
flcaseupdates@earthjustice.org
**Attorneys for Florida Rising, League of
United Latin American Citizens of
Florida, and Environmental
Confederation of Southwest Florida**

Sean T. Garner, General Counsel
Erik Saylor, Senior Attorney
Florida Department of Agriculture
& Consumer Services
Office of General Counsel
The Mayo Building
407 S. Calhoun Street, Suite 520
Tallahassee, FL 32399-0800
GeneralCounsel@fdacs.gov
Erik.Saylor@fdacs.gov
Kelly.wright@fdacs.gov
**Attorneys for Florida Department of
Agriculture & Consumer Services**

Jon C. Moyle, Jr.
Karen A. Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com
**Attorneys for Florida Industrial Power Users
Group**

Stephanie U. Eaton
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
seaton@spilmanlaw.com
and
Steven W. Lee
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
slee@spilmanlaw.com
Attorneys for Walmart Inc.

Brooks Rumenik, Director
Office of Energy
**Florida Department of Agriculture
& Consumer Services**
Brooks.Rumenik@fdacs.gov

William C. Garner
Law Office of William C. Garner, PLLC
3425 Bannerman Road Unit 105, No. 414
Tallahassee, FL 32312
wgarner@wcglawoffice.com
**Attorney for Southern Alliance for Clean
Energy**

By: s/ William P. Cox
William P. Cox