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April 8, 2025

VIA ELECTRONIC FILING

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

Re: Docket No. 20250011-EI
In re: Petition for Rate Increase by Florida Power & Light Company

Dear Mr. Teitzman:

Enclosed for filing in the above-referenced matter, please find attached Florida Power & Light Company's Response in Opposition to the Office of Public Counsel's Request for Oral Argument.

If you or your staff have any question regarding this filing, please contact me at (561) 691-7144.

Respectfully submitted,

/sChristopher T. Wright
Christopher T. Wright
Fla. Auth. House Counsel No. 1007055

Enclosures

cc: Certificate of Service

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Florida
Power & Light Company

Docket No. 20250011-EI

Filed: April 8, 2025

**FLORIDA POWER & LIGHT COMPANY’S RESPONSE IN OPPOSITION
TO THE OFFICE OF PUBLIC COUNSEL’S REQUEST FOR ORAL ARGUMENT**

Florida Power & Light Company (“FPL”) hereby files this response in opposition to the Office of Public Counsel’s (“OPC”) Request for Oral Argument (“Request”) on OPC’s Motion to Enlarge Discovery (“Motion”). As explained below, oral argument is entirely unnecessary and would be nothing more than a needless waste of time and resources. In support, FPL states as follows:

1. Granting or denying a request for oral argument is within the sole discretion of the Commission. Rule 25-22.0022(3), F.A.C. However, a request for oral argument is not guaranteed or automatically approved. 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. Rule 25-22.0022(1), Florida Administrative Code (emphasis). Thus, the party requesting oral argument has the burden to state why argument is necessary.

2. Other than merely repeating the standard required by the Rule, OPC’s Request fails to offer any reason why oral argument would aid the Commission in understanding and evaluating the issues in OPC’s Motion. Thus, OPC has failed to meet its burden required for oral argument and its Request should be denied.

3. In its Request, OPC seeks to present oral argument on its Motion requesting unlimited discovery or at least 1,500 interrogatories in this proceeding. As the party seeking to

expand the discovery limits in this proceeding, OPC has the burden to demonstrate good cause why the current discovery limits adopted by the Order Establishing Procedure No. PSC-2025-0075-PCO-EI (“OEP”) are insufficient to obtain relevant information necessary to evaluate FPL’s filing.¹

4. To meet its burden, OPC’s Motion has set forward the reasons that OPC believes the discovery limits established by the OEP are insufficient. These reasons are straightforward and do not require any further explanation through oral argument. Indeed, OPC has offered nothing specific in its Request to support that oral argument would aid the Commission in understanding the issues raised in its Motion.

5. FPL submits that OPC’s Motion and FPL’s Response to that Motion are sufficient on their face to evaluate and decide OPC’s Motion without the need for further argument or explanation. Either OPC has alleged facts and circumstances sufficient to meet its burden to demonstrate good cause to exceed the discovery limits, or it has not.

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.

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

¹ See Fla. R. Civ. P. 1.340(a). See also *In Re: Application for rate increase and increase in service availability charges by Southern States Utilities, Inc. for Orange-Osceola Utilities, Inc.*, Order No. PSC-95-1453-FOF-WS, Docket No. 950495-WS (FPSC Nov. 28, 1995) (“This rule places the burden on the person requesting the additional interrogatories to demonstrate good cause why they should be permitted”).

Respectfully submitted this 8th day of April 2025,

By: /s/ Christopher T. Wright

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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 8th day of April 2025:

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