

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by Tampa Electric Company : **DOCKET NO. 20240026-EI**
:
:
: **Filed: August 7, 2024**

**PREHEARING STATEMENT OF
WALMART INC.**

Pursuant to Florida Public Service Commission's ("Commission") Order No. PSC-2024-0096-PCO-EI, issued April 16, 2024, Walmart Inc. ("Walmart") files its Prehearing Statement in the above-referenced Docket No. 20240026-EI.

I. APPEARANCES

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II. WITNESSES

Walmart incorporates by reference the June 6, 2024, Direct Testimony and Exhibits of Florida Retail Federation ("FRF") witness Steve W. Chriss, who addresses Issues 1, 39, 70-74, 79-83, OPC-1, and OPC-2.

III. EXHIBITS

Walmart incorporates by reference the June 6, 2024, Exhibits of FRF witness Steve W. Chriss, SWC-1 through SWC-5.

IV. WALMART'S STATEMENT OF BASIC POSITION

Walmart adopts FRF's Statement of Basic Position except where noted otherwise in the Issues below.

V. ISSUES

2025 TEST PERIOD AND FORECASTING

Issue 1: Is TECO's projected test period for the twelve months ending December 31, 2025, appropriate?

Position: Walmart adopts the position of FRF.

Issue 2: Are TECO's forecasts of customers, KWH, and KW by revenue and rate class, appropriate?

Position: Walmart adopts the position of FRF.

Issue 3: What are the inflation, customer growth, and other trend factors that should be approved for use in forecasting the test year budget?

Position: Walmart adopts the position of FRF.

QUALITY OF SERVICE

Issue 4: Is the quality of electric service provided by TECO adequate?

Position: Walmart agrees with OPC.

DEPRECIATION AND DISMANTLEMENT STUDY

Issue 5: Should currently prescribed depreciation rates and provision for dismantlement of TECO be revised?

Position: Walmart agrees with OPC.

Issue 6: What should be the implementation date for new depreciation rates and the provision for dismantlement?

Position: Walmart agrees with OPC.

Issue 7: What depreciation parameters and resulting depreciation rates for each depreciable plant account should be approved?

Position: Walmart agrees with OPC.

Issue 8: Based on the application of the depreciation parameters and resulting depreciation rates that the Commission approves, and a comparison of the theoretical reserves to the book reserves, what are the resulting imbalances?

Position: Walmart agrees with OPC.

Issue 9: What, if any, corrective reserve measures should be taken with respect to the imbalances identified in Issue 8?

Position: Walmart agrees with OPC.

Issue 10: Should the current amortization of investment tax credits (ITCs) and flow back of excess deferred income taxes (EDITs) be revised to reflect the approved depreciation rates?

Position: Walmart agrees with OPC.

Issue 11: What annual accrual for dismantlement should be approved?

Position: Walmart agrees with OPC.

Issue 12: What, if any, corrective dismantlement reserve measures should be approved?

Position: Walmart agrees with OPC.

2025 RATE BASE

Issue 13: Has TECO made the appropriate adjustments to remove all non-utility activities from Plant in Service, Accumulated Depreciation, and Working Capital in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 14: Should TECO's proposed Future Environmental Compliance Project be included in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 15: Should TECO's proposed Research and Development Projects be included in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 16: Should TECO's proposed Customer Experience Enhancement Projects be included in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 17: Should TECO's proposed Information Technology Capital Projects be included in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 18: Should TECO's proposed Solar Projects be included in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart has no position at this time, as it is still evaluating the issue.

Issue 19: Should TECO's proposed Grid Reliability and Resilience Projects be included in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 20: Should TECO's proposed Energy Storage projects be included in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart has no position at this time, as it is still evaluating the issue.

Issue 21: Should TECO's proposed Corporate Headquarters project be included in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 22: Should TECO's proposed South Tampa Resilience project be included in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 23: Should TECO's proposed Bearss Operations Center project be included in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 24: Should TECO's proposed Polk 1 Flexibility project be included in the 2025 projected test year? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 25: What amount of Plant in Service for the 2025 projected test year should be approved?

Position: Walmart agrees with OPC.

Issue 26: What amount of Accumulated Depreciation for the 2025 projected test year should be approved?

Position: Walmart agrees with OPC.

Issue 27: What amount of Construction Work in Progress for the 2025 projected test year should be approved?

Position: Walmart agrees with OPC.

Issue 28: What amount of level of Property Held for Future Use for the 2025 projected test year should be approved?

Position: Walmart agrees with OPC.

Issue 29: What amount of unfunded Other Post-retirement Employee Benefit (OPEB) liability and any associated expense should be included in rate base?

Position: Walmart agrees with OPC.

Issue 30: What level of TECO's fuel inventories should be approved?

Position: Walmart agrees with OPC.

Issue 31: What amount of Working Capital for the 2025 projected test year should be approved?

Position: Walmart agrees with OPC.

Issue 32: What amount of rate base for the 2025 projected test year should be approved?

Position: Walmart agrees with OPC.

2025 COST OF CAPITAL

Issue 33: What amount of accumulated deferred taxes should be approved for inclusion in the capital structure for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 34: What amount and cost rate of the unamortized investment tax credits should be approved for inclusion in the capital structure for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 35: What amount and cost rate for customer deposits should be approved for inclusion in the capital structure for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 36: What amount and cost rate for short-term debt should be approved for inclusion in the capital structure for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 37: What amount and cost rate for long-term debt should be approved for inclusion in the capital structure for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 38: What equity ratio should be approved for use in the capital structure for ratemaking purposes for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 39: What authorized return on equity (ROE) should be approved for use in establishing TECO's revenue requirement for the 2025 projected test year?

Position: Walmart adopts the position of FRF.

Issue 40: What capital structure and weighted average cost of capital should be approved for use in establishing TECO's revenue requirement for the 2025 projected test year?

Position: Walmart agrees with OPC.

2025 NET OPERATING INCOME

Issue 41: Has TECO correctly calculated the revenues at current rates for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 42: What amount of Total Operating Revenues should be approved for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 43: What amount of O&M expense associated with Polk Unit 1 has TECO included in the 2025 projected test year? Should this amount be approved and what, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 44: What amount of O&M expense associated with Big Bend Unit 4 has TECO included in the 2025 projected test year? Should this amount be approved and what, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 45: What amount of generation O&M expense should be approved for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 46: What amount of transmission O&M expense should be approved for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 47: What amount of distribution O&M expense should be approved for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 48: Has TECO made the appropriate test year adjustments to remove fuel revenues and fuel expenses recoverable through the Fuel Adjustment Clause?

Position: Walmart agrees with OPC.

Issue 49: Has TECO made the appropriate test year adjustments to remove conservation revenues and conservation expenses recoverable through the Conservation Cost Recovery Clause?

Position: Walmart agrees with OPC.

Issue 50: Has TECO made the appropriate test year adjustments to remove capacity revenues and capacity expenses recoverable through the Capacity Cost Recovery Clause?

Position: Walmart agrees with OPC.

Issue 51: Has TECO made the appropriate test year adjustments to remove environmental revenues and environmental expenses recoverable through the Environmental Cost Recovery Clause?

Position: Walmart agrees with OPC.

Issue 52: Has TECO made the appropriate test year adjustments to remove all storm hardening revenues and expenses recoverable through the Storm Protection Plan Cost Recovery Clause?

Position: Walmart agrees with OPC.

Issue 53: What amount of salaries and benefits, including incentive compensation, should be approved for the 2025 projected test year?

Position: Walmart takes no position.

Issue 54: Does TECO's pension and OPEB expense properly reflect capitalization credits in the 2025 projected test year? If not, what adjustments, if any should be made?

Position: Walmart takes no position.

Issue 55: What cost allocation methodologies and what amount of allocated costs and charges with TECO's affiliated companies should be approved for the 2025 projected test year?

Position: Walmart takes no position.

Issue 56: What amount of Directors and Officers Liability Insurance expense for the 2025 projected test year should be approved?

Position: Walmart takes no position.

Issue 57: What amount of Economic Development expense for the 2025 projected test year should be approved?

Position: Walmart agrees with OPC.

Issue 58: What amount and amortization period for TECO's rate case expense for the 2025 projected test year should be approved?

Position: Walmart agrees with OPC.

Issue 59: What amount of O&M Expense for the 2025 projected test year should be approved?

Position: Walmart agrees with OPC.

Issue 60: What amount of depreciation and dismantlement expense for the 2025 projected test year should be approved?

Position: Walmart agrees with OPC.

Issue 61: What amount of Taxes Other Than Income Taxes for the 2025 projected test year should be approved?

Position: Walmart agrees with OPC.

Issue 62: What amount of Parent Debt Adjustment is required by Rule 25-14.004, Florida Administrative Code, for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 63: What amount of Production Tax Credits should be approved and what is the proper accounting treatment for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 64: What treatment, amounts, and amortization period for the Production Tax Credits that were deferred in 2022-2024 should be approved for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 65: What treatment and amount of the Investment Tax Credits pursuant to the Inflation Reduction Act should be approved for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 66: What amount of Income Tax expense should be approved for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 67: What amount of Net Operating Income should be approved for the 2025 projected test year?

Position: Walmart agrees with OPC.

2025 REVENUE REQUIREMENTS

Issue 68: What revenue expansion factor and net operating income multiplier, including the appropriate elements and rates, should be approved for the 2025 projected test year?

Position: Walmart adopts the position of FRF.

Issue 69: What amount of annual operating revenue increase for the 2025 projected test year should be approved?

Position: Walmart adopts the position of FRF.

2025 COST OF SERVICE AND RATES

Issue 70: Is TECO's proposed separation of costs and revenues between the wholesale and retail jurisdictions appropriate?

Position: Walmart adopts the position of FRF.

Issue 71: What is the appropriate methodology to allocate production costs to the rate classes?

Position: Walmart adopts the position of FRF.

Issue 72: What is the appropriate methodology to allocate transmission costs to the rate classes?

Position: Walmart adopts the position of FRF.

Issue 73: What is the appropriate methodology to allocate distribution costs to the rate classes?

Position: Walmart adopts the position of FRF.

Issue 74: How should any change in the revenue requirement approved by the Commission be allocated among the customer classes?

Position: Walmart adopts the position of FRF.

Issue 75: Should the proposed modifications to the delivery voltage credit be approved?

Position: Walmart agrees with OPC.

Issue 76: What are the appropriate service charges (initial connection, reconnect for nonpayment, connection of existing account, field visit, temporary overhead and underground, meter tampering)?

Position: Walmart agrees with OPC.

Issue 77: Should the modifications to the emergency relay power supply charge be approved?

Position: Walmart agrees with OPC.

Issue 78: What are the appropriate basic service charges?

Position: Walmart adopts the position of FRF.

Issue 79: What are the appropriate demand charges?

Position: Walmart adopts the position of FRF.

Issue 80: What are the appropriate energy charges?

Position: Walmart adopts the position of FRF.

Issue 81: What are the appropriate Lighting Service rate schedule charges?

Position: Walmart adopts the position of FRF.

Issue 82: What are the appropriate Standby Services (SS-1, SS-2, SS-3) rate schedule charges?

Position: Walmart adopts the position of FRF.

Issue 83: Should the proposed modifications to the time-of-day periods be approved?

Position: Walmart adopts the position of FRF.

Issue 84: Should the proposed modifications to the Non-Standard Meter Rider tariff (Tariff Sheet No. 3.280) be approved?

Position: Walmart agrees with OPC.

Issue 85: Should the proposed tariff modifications to the Budget Billing Program (Fifth Revised Tariff Sheet No. 3.020) be approved?

Position: Walmart agrees with OPC.

Issue 86: Should the proposed tariff modifications regarding general liability and customer responsibilities (Fifth Revised Tariff Sheet No. 5.070 and Original Tariff Sheet No. 5.081) be approved?

Position: Walmart agrees with OPC.

Issue 87: Should the proposed tariff modifications to Contribution in Aid of Construction (Fifth Revised Tariff Sheet No. 5.105) be approved?

Position: Walmart agrees with OPC.

Issue 88: Should the proposed tariff modifications to the Economic Development Rider (Third Revised Tariff Sheet Nos. 6.720, 6.725, 6.730) be approved?

Position: Walmart agrees with OPC.

Issue 89: Should the proposed modifications to LS-1 (Eleventh Revised Tariff Sheet No. 6.809) regarding lighting wattage variance be approved?

Position: Walmart agrees with OPC.

Issue 90: Should the proposed LS-2 Monthly Rental Factors (Original Tariff Sheet No. 6.845) be approved?

Position: Walmart agrees with OPC.

Issue 91: Should the proposed termination factors for long-term facilities (Fifth Revised Tariff Sheet No. 7.765) be approved?

Position: Walmart agrees with OPC.

Issue 92: Should the non-rate related tariff modifications be approved?

Position: Walmart agrees with OPC.

Issue 93: Should the Commission give staff administrative authority to approve tariffs reflecting Commission approved rates and charges?

Position: Walmart agrees with OPC.

2026 AND 2027 SUBSEQUENT YEAR ADJUSTMENTS (SYA)

Issue 94: What are the considerations or factors that the Commission should evaluate in determining whether an SYA should be approved?

Position: Walmart agrees with OPC.

Issue 95: Should the Commission approve the inclusion of TECO's proposed Solar Projects in the 2026 and 2027 SYA? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 96: Should the Commission approve the inclusion of TECO's proposed Grid Reliability and Resilience Projects in the 2026 and 2027 SYA? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 97: Should the Commission approve the inclusion of TECO's proposed Polk 1 Flexibility Project in the 2026 SYA? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 98: Should the Commission approve the inclusion of TECO's proposed Energy Storage Projects in the 2026 SYA? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 99: Should the Commission approve the inclusion of TECO's proposed Bearss Operations Center Project in the 2026 SYA? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 100: Should the Commission approve the inclusion of TECO's proposed Corporate Headquarters Project in the 2026 SYA? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 101: Should the Commission approve the inclusion of TECO's proposed South Tampa Resilience Project in the 2026 and 2027 SYA? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 102: Should the Commission approve the inclusion of TECO's proposed Polk Fuel Diversity Project in the 2026 and 2027 SYA? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 103: What overall rate of return should be used to calculate the 2026 and 2027 SYA?

Position: Walmart agrees with OPC.

Issue 104: Should the SYA for 2026 and 2027 reflect additional revenues due to customer growth? What, if any, adjustments should be made?

Position: Walmart agrees with OPC.

Issue 105: Should the Commission approve the inclusion of TECO's proposed incremental O&M expense associated with the SYA projects in the 2026 and 2027 SYA?

Position: Walmart agrees with OPC.

Issue 106: Should the depreciation expense and Investment Tax Credits amortization used to calculate the proposed 2026 and 2027 SYA be adjusted to reflect the Commission's decisions on depreciation rates and ITC amortization for the 2025 projected test year?

Position: Walmart agrees with OPC.

Issue 107: What annual amount of incremental revenues should be approved for recovery through the 2026 and 2027 SYA?

Position: Walmart adopts the position of FRF.

Issue 108: What rate design approach should be used to develop customer rates for the 2026 and 2027 SYA?

Position: Walmart adopts the position of FRF.

Issue 109: When should the 2026 and 2027 SYA become effective?

Position: Walmart adopts the position of FRF.

Issue 110: Should TECO be required to file its proposed 2026 and 2027 SYA rates for Commission approval in September 2026 and 2027, respectively, reflecting then current billing determinants?

Position: Walmart adopts the position of FRF.

OTHER

Issue 111: Should TECO's proposed Corporate Income Tax Change Provision be approved?

Position: Walmart agrees with OPC.

Issue 112: Should TECO's proposed Storm Cost Recovery Provision be approved?

Position: Walmart opposes the resolution of this issue in this Docket as to the procedure by which TECO collects future storm costs from customers, though Walmart agrees that such collection of future storm costs would not be subject to a rate case type inquiry.

Issue 113: Should TECO's proposed Asset Optimization Mechanism be approved, and what, if any, modifications should be made?

Position: Walmart agrees with OPC.

Issue 114: What are the appropriate updated Clean Energy Transition Mechanism factors and when should they become effective?

Position: Walmart agrees with OPC.

Issue 115: Should the proposed Senior Care Program (Original Tariff Sheet No. 3.310) and associated cost recovery be approved?

Position: Walmart agrees with OPC.

Issue 116: Should TECO be required to perform any studies or analysis relating to the retirement of Polk Unit 1 and/or Big Bend Unit 4, including early retirement dates, environmental compliance costs, and/or procurement of alternative resources?

Position: Walmart adopts the position of FRF.

Issue 117: What is the appropriate effective date for TECO's revised 2025 rates and charges?

Position: Walmart adopts the position of FRF.

Issue 118: Has the Commission considered TECO's performance pursuant to Sections 366.80–366.83 and 403.519, Florida Statutes, when establishing rates?

Position: Walmart agrees with OPC.

Issue 119: Should TECO be required to file, within 90 days after the date of the final order in this docket, a description of all entries or adjustments to its annual

report, rate of return reports, and books and records which will be required as a result of the Commission's findings in this rate case?

Position: Walmart adopts the position of FRF.

Issue 120: Should this docket be closed?

Position: Walmart adopts the position of FRF.

VI. CONTESTED ISSUES

SC-2: Should TECO recover O&M expense associated with keeping integrated gasification, steam turbine, and/or heat recovery steam generator components at Polk Unit 1 in long-term standby, and what adjustments should be made?

Position: Walmart takes no position.

SC-5: Should TECO recover O&M expense associated with injecting wastewater into deep wells at Polk Unit 1 and Big Bend Unit 4, and what adjustments should be made?

Position: Walmart takes no position.

SC-6: Should TECO recover any O&M expense associated with coal or petcoke combustion at Polk Unit 1 and/or Big Bend Unit 4, and what adjustments should be made?

Position: Walmart takes no position.

SC-12: Should TECO be required to apply for the U.S. Department of Energy's Energy Infrastructure Reinvestment Program for Polk Unit 1 and/or Big Bend Unit 4?

Position: Walmart takes no position.

SC-13: Should TECO be required to cease all coal combustion at Polk Unit 1 by 2024 and Big Bend Unit 4 by 2025?

Position: Walmart takes no position.

OPC-1: What considerations should the Commission give the affordability of customer bills in this proceeding?

Position: Walmart adopts the position of FRF.

OPC-2: What impact will TECO's rate increase have on rate payers?

Position: Walmart adopts the position of FRF.

OPC-3: Should TECO continue to operate as the *de facto* centralized service provider, and if so, what additional measures should be taken, if any, to facilitate its operation as the centralized service provider?

Position: Walmart agrees with OPC.

VII. STIPULATED ISSUES

None at this time.

VIII. PENDING MOTIONS OR OTHER ACTIONABLE MATTERS

Walmart's Petition to Intervene is currently pending.

IX. PENDING CONFIDENTIALITY REQUESTS OR CLAIMS

Walmart has no pending confidentiality requests or claims.

X. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

Walmart does not object to any witness's qualifications as an expert.

XI. COMPLIANCE WITH ORDER NO. PSC-2024-0096-PCO-EI

There are no requirements of Order No. PSC-2024-0096-PHO-EI with which Walmart cannot comply.

Respectfully submitted,

By /s/ Stephanie U. Eaton

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Counsel to Walmart Inc.

Dated: August 7, 2024

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 this 7th day of August, 2024.

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