

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Review of 2020-2029 Storm Protection Plan  
pursuant to Rule 25-6.030, F.A.C., Florida  
Power & Light Company

Docket No. 20200071-EI

Filed: July 20, 2020

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

Florida Power & Light Company (“FPL”), by and through its undersigned counsel, hereby submits this Preheating Statement pursuant to Order Nos. PSC-2020-0073-PCO-EI and PSC-2020-0122-PCO-EI, and states:

**1. FPL WITNESSES**

**A. Direct Testimony**

<u>Witness</u>	<u>Subject Matter - Direct</u>	<u>Issue #</u>
Michael Jarro	Provides an overview of FPL’s proposed 2020-2029 Storm Protection Plan (“SPP” or “the Plan”), and demonstrates that FPL’s SPP is in compliance with Section 366.96, Florida Statutes (“F.S.”) and Rule 25-6.030, Florida Administrative Code (“F.A.C.”). Describes each storm protection program included in FPL’s SPP and how it is expected to achieve the legislative objectives of reducing restoration costs and outage times associated with extreme weather events. Describes the estimated start/completion dates, estimated costs, and criteria used to select and prioritize the projects in each program. Describes the additional detail provided for the first three years of FPL’s SPP pursuant to Rule 25-6.030(3)(e)-(f), (h), and (i), F.A.C.	1D-7D

**B. Rebuttal Testimony**

<u>Witness</u>	<u>Subject Matter - Rebuttal</u>	<u>Issue #</u>
Michael Jarro	Responds to certain portions of the direct testimonies submitted on behalf of intervenors Office of Public Counsel (“OPC”) and Walmart Inc. (“Walmart”). Explains that, based on the reasoning set forth in the testimony of OPC witness Mara, it appears that OPC essentially agrees with seven out of the eight programs included in FPL’s SPP, and that the only truly contested program is FPL’s proposal to transition the existing Storm Secure Underground Pilot (“SSUP Pilot”) during 2021-2029 to a system-wide Lateral Hardening (Undergrounding) – Distribution Program to provide the benefits of underground lateral hardening throughout its system. Responds to OPC’s assertion that the Florida Public Service Commission (“PSC” or the “Commission”)	1D-7D

	<p>should adopt and implement a new resiliency test in this proceeding to evaluate FPL’s SPP, and explains why such a position is contrary to Section 366.96, F.S., and Rule 25-6.030, F.A.C., and unnecessary. Demonstrates that OPC’s contentions that the PSC should require further cost-benefit analyses and storm damage assessment modeling for FPL’s SPP programs and projects are both contrary to Section 366.96, F.S., and Rule 25-6.030, F.A.C., and unnecessary. Responds to OPC’s St. Augustine substation relocation alternative to the Substation Storm Surge/Flood Mitigation – Program, and explains why OPC’s proposed alternative is not in the public interest. Addresses OPC’s positions regarding the Lateral Hardening (Undergrounding) – Distribution Program, and explains that OPC’s proposal to not underground any laterals is inconsistent with Section 366.96, F.S., and how storm hardening has been pursued in Florida for the last 14 years. Responds to OPC’s positions regarding the economic impact of COVID-19 and its contention that FPL should delay certain of its SPP programs and projects, and explains why it is important to continue working to improve the resiliency of the energy grid.</p>	
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**2. EXHIBITS**

<u>Witness</u>	<u>Proffered By</u>	<u>Exhibit #</u>	<u>Description</u>	<u>Issue #</u>
Michael Jarro	FPL	MJ-1	Florida Power & Light Company 2020-2029 Storm Protection Plan, as corrected by an Errata submitted on May 12, 2020, correcting an inadvertent error on pages 46 and 47 and by a Second Errata submitted on July 13, 2020, correcting a scrivener's error on page 2 of Appendix C.	1D-7D

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 Section 366.96, F.S., and Rule 25-6.030, F.A.C., FPL has proposed a 2020-2029 SPP to reasonably achieve the legislative objectives of promoting the overhead hardening of electrical distribution and transmission facilities, the undergrounding of certain electrical

distribution lines, and vegetation management to reduce restoration costs and outage times associated with extreme weather events. FPL's SPP is largely a continuation and expansion of its existing storm hardening and storm preparedness programs, which were most recently approved in FPL's 2019-2021 Storm Hardening Plan.<sup>1</sup> These existing hardening and storm preparedness programs have already demonstrated that they have and will continue to increase T&D infrastructure resiliency, reduce outage times, and reduce restoration costs when FPL's system is impacted by extreme weather events. FPL performed an analysis of Hurricanes Matthew and Irma that indicated the restoration construction man-hours ("CMH"), days to restore, and storm restoration costs for these storms would have been significantly higher without FPL's storm hardening programs.<sup>2</sup>

In its SPP, FPL has proposed the following 8 programs:

- Pole Inspections – Distribution Program
- Structures/Other Equipment Inspections – Transmission Program
- Feeder Hardening (EWL) – Distribution Program
- Lateral Hardening (Undergrounding) – Distribution Program
- Wood Structures Hardening (Replacing) – Transmission Program
- Substation Storm Surge/Flood Mitigation –Program
- Vegetation Management – Distribution Program
- Vegetation Management – Transmission Program

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<sup>1</sup> See *In re: Petition for Approval of Florida Power & Light Company's 2019-2021 Storm Hardening Plan pursuant to Rule 25-6.0342, F.A.C.*, Docket No. 20180144-EI, Order No. PSC-2019-0364-CO-EI (Fla. PSC Aug. 27, 2019) (making Order No. PSC-2019-0301-PAA-EI issued on July 29, 2019, effective and final).

<sup>2</sup> See FPL's Third Supplemental Response to Staff's First Data Request No. 29 ("Third Supplemental Amended") in Docket No. 20170215-EI, which is provided as Appendix A to Exhibit MJ-1.

With the exception of the new Substation Storm/Surge Mitigation Program and the proposal to transition FPL's existing three-year Storm SSUP Pilot to a system-wide Lateral Hardening (Undergrounding) – Distribution Program,<sup>3</sup> each of these storm hardening programs and storm preparedness initiatives (*i.e.*, six out of eight) have been in place since 2007 and have been reviewed and approved as part of FPL's Storm Hardening Plans, storm initiatives, and annual reliability filings.

FPL's SPP includes descriptions of the estimated costs and benefits of the SPP programs and criteria to select and prioritize the SPP projects, as well as additional details for the first three years of the SPP. FPL's SPP also provides the estimated revenue requirements for each SPP program, and the estimated rate impact for the first three years of the SPP. FPL's SPP provides the information required by and is fully consistent with Rule 25-6.030, F.A.C. The Commission can use and compare all of the information it specifically required FPL to provide in the SPP to determine if, pursuant to Section 366.96, F.S., the programs and projects included in the SPP are in the public interest and should be approved.

No parties dispute that FPL's SPP programs will achieve the legislative objectives of reducing restoration costs and outage times associated with extreme weather events. Indeed, as explained by FPL witness Jarro, OPC essentially agrees with six (6) out of the eight (8) FPL SPP programs because they are existing "core programs" that have also been used for many years; have been reviewed by the Commission as part of FPL's Storm Hardening Plans, storm initiatives, and annual reliability filings; and FPL has demonstrated that these programs have and will continue to

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<sup>3</sup> Although OPC opposes FPL's Lateral Hardening (Undergrounding) – Distribution Program, the continuation of the SSUP Pilot through the end of 2020 and the transition to a system-wide lateral underground program in 2021 were both approved in FPL's 2019-2021 Storm Hardening Plan. *See In re: Petition for Approval of Florida Power & Light Company's 2019-2021 Storm Hardening Plan pursuant to Rule 25-6.0342, F.A.C.*, Docket No. 20180144-EI, Order No. PSC-2019-0364-CO-EI (Fla. PSC Aug. 27, 2019) (making Order No. PSC-2019-0301-PAA-EI issued on July 29, 2019, effective and final).

reduce outage times due to extreme weather conditions as provided in Sections II and IV and Appendix A to Exhibit MJ-1. Further, OPC essentially agrees with FPL’s proposed Substation Storm Surge/Flood Mitigation – Program but recommends that FPL consider a relocation alternative for the St. Augustine Substation, which, as explained by FPL witness Jarro, would be costlier than raising the equipment above the flood level at the existing site as proposed. Thus, the only truly contested program is FPL’s proposal to transition the existing Storm Secure Underground Pilot (“SSUP”) during 2021-2029 to a system-wide Lateral Hardening (Undergrounding) – Distribution Program to provide the benefits of underground lateral hardening throughout its system.

OPC argues that the Commission should apply new resiliency standards when reviewing utility proposed SPP expenditures to ensure that the approved projects meaningfully improve resiliency. OPC is improperly attempting to re-litigate the Storm Protection Plan Rule 25-6.030, F.A.C., approved by this Commission and add a new resiliency test that is not prescribed by the Rule. There is no need to develop a new resiliency standard or test because the Florida Legislature and Commission have already defined storm resiliency for purposes of SPP in Section 366.96, F.S., and Rule 25-6.030, F.A.C. – reduction in restoration costs and outage times associated with extreme weather conditions. FPL has demonstrated in Sections II and IV, and Appendix A of Exhibit MJ-1 that each of its SPP programs will improve storm resiliency by reducing restoration costs and outages associated with extreme weather conditions.

OPC also recommends that further cost-benefit analyses and storm damage assessment modeling should be performed for FPL’s SPP programs and projects. OPC is, once again, improperly attempting to re-litigate the Storm Protection Plan Rule 25-6.030, F.A.C., approved by this Commission and add formulaic cost-benefit analyses and cost-effectiveness tests that were not prescribed by the Rule. There is nothing in Section 366.96, F.S., or Rule 25-6.030, F.A.C., that

prescribes or requires a cost-benefit analysis or cost-effectiveness test for the SPP programs and projects. Instead, Rule 25-6.030(3)(d)(4), F.A.C., requires the SPP to include a “comparison” of the estimated costs and estimated benefits for each SPP program, which FPL provided in the following portions of its SPP: Section II; the “Comparison of Costs and Benefits” included in each SPP program description in Section IV; and Appendix A of Exhibit MJ-1. Further, storm hardening is not a simple cost-effective proposition as suggested by OPC’s recommendation. OPC focuses only on program costs and savings in restoration costs (*i.e.*, a strictly quantitative analysis), and completely ignores the qualitative component required by both the Statute and Rule – reduction in outage times associated with extreme weather conditions.

Although OPC witness Mara admits that undergrounding laterals provides much greater resiliency during extreme weather events, OPC apparently does not support FPL’s Lateral Hardening (Undergrounding) – Distribution Program because, according to OPC’s witness, it is not cost effective from a purely quantitative basis. But what OPC witness Mara fails to observe is that OPC’s strict cost-effectiveness approach is not required by Rule, 25-6.030, F.A.C., or Section 366.96, F.S., is not how Florida has pursued storm hardening for the last 14 years, and is contrary to Section 366.96, F.S., which expressly promotes the undergrounding of distribution laterals. As is the case with all of the historical storm hardening programs that FPL has done over the past 14 years, the benefits of those efforts have not and reasonably cannot be measured on restoration cost savings alone. That is why the Florida Legislature deliberately charged the Commission with determining whether a proposed storm protection plan is “in the public interest” and not whether the plan meets any sort of strict, mathematical cost/benefit comparison. OPC cannot now substitute its preference or judgment on this point for that of the Florida Legislature.

Although OPC witness Mara agrees with FPL’s proposal to prioritize laterals for undergrounding on a feeder basis, OPC recommends that not all laterals on a selected feeder should

be undergrounded and, instead, proposes an arbitrary limit of no more than 10 or 15 laterals per feeder be converted to underground under FPL's Lateral Hardening (Undergrounding) – Distribution Program. OPC overlooks that the priority for selection of laterals remains the same as its Commission-approved SSUP Pilot. As explained by FPL witness Jarro, FPL is using a feeder based approach for its deployment of the Lateral Hardening (Undergrounding) – Distribution Program because one of the lessons learned from the SSUP Pilot is that implementing projects at the feeder level provides a less costly solution (by approximately 12-20%) from an engineering, permitting, and construction standpoint compared to deploying on a single lateral basis.

Finally, OPC recommends that the economic impacts of COVID-19 on the Florida economy should be considered by the Commission in reviewing FPL's SPP, and that FPL should re-file or file an update to its plan in 2022 to consider the impacts of the pandemic and the effects to Florida citizens and businesses. As explained by FPL witness Jarro, while FPL recognizes that the COVID-19 pandemic has caused hardships for customers and the communities it serves, FPL must not delay its efforts and should continue working to improve the resiliency of the energy grid, particularly given that hurricanes will continue to threaten FPL's territory and customers regardless of economic conditions.

For all the reasons discussed above, and as explained in more detail in the direct and rebuttal testimony provided by FPL witness Jarro, FPL's proposed 2020-2029 SPP is in the public interest and should be approved. FPL's proposed 2020-2029 SPP complies with the requirements and objectives of Section 366.96, F.S., complies with Rule 25-6.030, F.A.C., and provides a systematic approach to achieve the legislative objectives of reducing restoration costs and outage times associated with extreme weather events.

#### 4. **STATEMENT OF ISSUES AND POSITIONS**

##### A. **STAFF'S ISSUES**

Issue No. 1D: Does FPL's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

**FPL Position:** Yes. FPL's 2020-2029 SPP includes all of the information required by Rule 25-6.030(3), F.A.C. (*FPL witness Jarro*)

Issue No. 2D: To what extent is FPL's 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

**FPL Position:** FPL has demonstrated in Sections II and IV, and Appendix A of Exhibit MJ-1 that each of its SPP programs have and will continue to provide increased T&D infrastructure resiliency, reduced outage times, and reduced restoration costs when FPL's system is impacted by severe weather events. Importantly, these benefits include both quantitative and qualitative components consistent with Section 366.96, F.S., and Rule 25-6.030, F.A.C. With the exception of the new Substation Storm/Surge Mitigation Program and the proposal to transition FPL's existing three-year lateral underground pilot to a system-wide lateral underground program, each of FPL's storm hardening programs and storm preparedness initiatives have been in place since 2007 and have been reviewed and approved as part of FPL's Storm Hardening Plans, storm initiatives, and annual reliability filings. As demonstrated by recent storm events, these programs have been successful in reducing restoration costs and outage times following major storms, as well as improving day-to-day reliability. Continuing these previously-approved storm hardening and storm preparedness programs in the SPP, together with the new Substation Storm/Surge Mitigation Program and the proposal to transition FPL's existing three-year lateral



underground pilot to a system-wide lateral underground program, is appropriate and crucial to further mitigate restoration costs and outage times. (*FPL witness Jarro*)

Issue No. 3D: To what extent does FPL's 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

**FPL Position:** FPL's 2020-2029 SPP prioritizes areas of lower reliability performance. A description of the criteria used to select and prioritize storm protection projects is included in the description of each SPP program provided in Section IV of Exhibit MJ-1. FPL has selected, prioritized, and deployed all of its historical storm hardening programs in a deliberate and effective manner over the past fourteen years and FPL is employing this same approach for its SPP programs. (*FPL witness Jarro*)

Issue No. 4D: To what extent is FPL's 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of FPL's service territory, including, but not limited to, flood zones and rural areas?

**FPL Position:** As explained in Section II of Exhibit MJ-1, FPL has not identified any areas of its service territory where its SPP programs would not be feasible, reasonable, or practical. While all of FPL's SPP programs are system-wide initiatives, annual activities are prioritized based on certain factors such as last inspection date, last trim date, reliability performance, and efficient resource utilization. At this time, there is no area specifically targeted or prioritized for enhanced performance based on its geographical location. The criteria and factors used to select and prioritize projects within each SPP program are provided in Section IV of Exhibit MJ-1. (*FPL witness Jarro*)

Issue No. 5D: What are the estimated costs and benefits to FPL and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

**FPL Position:** The estimated costs for each SPP program, including the estimated annual capital costs and operating expenses, are provided in Section IV and Appendix C of Exhibit MJ-1. With the exception of the new Substation Storm/Surge Mitigation Program and the proposal to transition FPL's existing three-year Storm Secure Underground Program Pilot to a system-wide Lateral Hardening (Undergrounding) – Distribution Program, the average annual cost for each SPP program is consistent with historical costs. Each of its SPP programs have and will continue to provide increased T&D infrastructure resiliency, reduced outage times, and reduced restoration costs when FPL's system is impacted by severe weather events. A detailed summary of the benefits of FPL's SPP is provided in Section II of the SPP, and the benefits of each program are provided in Section IV of the SPP. (*FPL witness Jarro*)

Issue No. 6D: What is the estimated annual rate impact resulting from implementation of FPL's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

**FPL Position:** FPL anticipates the programs included in the SPP will have zero bill impacts on customer bills during the first year of the SPP and only minimal bill increases for years two and three of the SPP. As provided in Section VII of Exhibit MJ-1, the hypothetical rate impacts for FPL's typical residential, commercial, and industrial customers for the first three years of the SPP (2020-2022), without regard for the fact that FPL remains under a general base rate freeze pursuant to a Commission-approved settlement agreement through December 31, 2021, are as follows for 2020, 2021, and 2022, respectively: Residential (RS-1) \$0.00251/kWh, \$0.00357/kWh, and \$0.00478/kWh; Commercial (GSD-1) \$0.81/kW, \$1.15/kW, and \$1.54/kW; and Industrial (GSLDT-3)

\$0.05/kW, \$0.08/kW and \$0.10/kW. The estimated rate impacts are based on the total estimated costs, as of the time of the April 10, 2020 filing date, for all programs included in the SPP regardless of whether those costs will be recovered in FPL's Storm Protection Plan Cost Recovery Clause or through base rates. The actual costs incurred for each SPP program will be addressed in the Storm Protection Plan Cost Recovery Clause dockets.

*(FPL witness Jarro)*

Issue No. 7D: Is it in the public interest to approve, approve with modification, or deny FPL's 2020-2029 Storm Protection Plan?

**FPL Position:** FPL's SPP meets the objectives of Section 366.96, F.S., satisfies the requirements of Rule 25-6.030, F.A.C., is in the public interest, and should be approved without modification. FPL's SPP provides a systematic approach to achieve the legislative objectives of reducing restoration costs and outage times associated with extreme weather events and enhancing reliability. FPL's SPP programs are largely a continuation and expansion of FPL's already successful and ongoing storm hardening and storm preparedness programs previously approved by the Commission, as well as a new storm hardening program to protect T&D substations and equipment from storm surge and flooding due to extreme weather events. FPL's SPP programs will continue to provide increased T&D infrastructure resiliency, reduced outage times, and reduced restoration costs when FPL's system is impacted by extreme weather events. These benefits of the SPP will be provided with zero bill impacts on customer bills during the first year of the SPP and only minimal bill increases for years two and three of the SPP. *(FPL witness Jarro)*

Issue No. 8D: Should these dockets be closed?

**FPL Position:** Yes. This docket should be closed upon the issuance of an appropriate order approving FPL's proposed SPP without modification.

## **B. CONTESTED ISSUES**

OPC Proposed

Issue No. 1: Are any of the proposed SPP project or program related costs, if approved, and presumably to be requested for recovery by the Company through the SPPCRC, costs recovered through the Company's base rates?

**FPL Position:** FPL objects to OPC Proposed Issue 1 on the basis that it is irrelevant to and beyond the scope of this proceeding for multiple reasons. First, both Section 366.96(7), F.S., and Rule 25-6.031(6)(b), F.A.C. clearly provide that the time and place to address whether the SPP costs are being recovered in base vs. clause is in the Storm Protection Plan Cost Recovery Clause ("SPPCRC") docket.

Second, there is nothing in Rule 25.6.030 that mentions costs being recovered in base rates, incremental costs, or costs to be recovered in the SPPCRC. Indeed, the Commission's intent is confirmed by Rule 25-6.031, F.A.C., which expressly directs the utility to identify the costs to be included in the SPPCRC and states that such costs cannot include costs recoverable through base rates or any other cost recovery mechanism.

Third, the Commission has opened Docket No. 20200092-EI to address SPPCRC, and OPC will certainly have an opportunity to properly raise this issue in that proceeding.

Finally, and importantly, the Prehearing Officer in this proceeding has already concluded that issues regarding recovery of SPP costs and whether such costs are currently being recovered in base rates are irrelevant to this SPP proceeding and will be addressed

in the SPPCRC proceeding in Docket No. 20200092. *See* Commission Order No. PSC-2020-0162-PCO-EI (Issued May 19, 2020).

For these reasons, OPC Proposed Issue 1 should be rejected as an issue in this proceeding.

OPC Proposed

Issue No. 2: Should the Commission defer its determination of prudence for any of the Company's proposed programs and projects?

**FPL Position:** FPL objects to OPC Proposed Issue 2 on the basis that it is irrelevant to and unnecessary for this proceeding. Section 366.96(6), F.S., expressly provides that the standard to be applied by the Commission in determining whether to approve a SPP is whether the SPP is in the public interest. Further, Section 366.96(4), F.S., identifies the factors that the Commission shall consider in reaching this determination.

Additionally, Rule 25-6.031(2), F.A.C., expressly provides that the prudence standard is to be applied in the annual SPPCRC hearings and only to the "actual Storm Protection Plan costs incurred by the utility." Thus, the actual SPPCRC costs incurred by FPL and whether those costs are prudent is an issue to be addressed in the SPPCRC proceeding in Docket No. 20200092. FPL incorporates its position and argument to OPC Proposed Issue 1 as though fully set forth herein. For those reasons, which are equally applicable here, OPC Proposed Issue 2 should be rejected as an issue in this proceeding.

For these reasons, OPC Proposed Issue 2 should be rejected as an issue in this proceeding.

**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.

**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, FPL is not aware of any Requests for Confidential Classification that remain pending.

**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 20th day of July, 2020,

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was served by electronic delivery this 20th day of July, 2020 to the following:

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