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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: DOCKET NO. 20260020-EI
Petition for determination of need for
Andytown-Oasis transmission lines project in
Broward and Miami-Dade Counties, by Florida
Power & Light Company.

VOLUME 1 of 1
PAGES 1 - 166

PROCEEDINGS: HEARING
COMMISSIONERS
PARTICIPATING: CHAIRMAN GARY F. CLARK
COMMISSIONER BOBBY PAYNE
COMMISSIONER ANA ORTEGA
DATE: Thursday, April 23, 2026
TIME: Commenced: 9:30 a.m.
Concluded: 10:25 a.m.
PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida
REPORTED BY: DEBRA R. KRICK
Court Reporter

PREMIER REPORTING
TALLAHASSEE, FLORIDA
(850) 894-0828

1 APPEARANCES:

2 WILLIAM COX and CHRISTOPHER WRIGHT, ESQUIRES,
3 700 Universe Boulevard, Juno Beach, FL 33408-0420;
4 KENNETH A. HOFFMAN, ESQUIRE, 134 West Jefferson Street,
5 Tallahassee, FL 32301-1713; appearing on behalf of
6 Florida Power & Light Company (FPL).

7 WALT TRIERWEILER, PUBLIC COUNSEL; CHARLES
8 REHWINKEL, DEPUTY PUBLIC COUNSEL; PATRICIA A.
9 CHRISTENSEN, ESQUIRE, OFFICE OF PUBLIC COUNSEL, c/o The
10 Florida Legislature, 111 West Madison Street, Room 812,
11 Tallahassee, FL 32399-1400, appearing on behalf of the
12 Citizens of the State of Florida (OPC).

13 ROBERT SCHEFFEL WRIGHT, JOHN T. LaVIA, III and
14 TIMOTHY J. PERRY, ESQUIRES, Gardner Bist King & Wood,
15 1300 Thomaswood Drive, Tallahassee, Florida 32308;
16 appearing on behalf Environmental Defense Fund (EDF).

17 CARLOS MARQUEZ and SHAW STILLER, ESQUIRES,
18 FPSC General Counsel's Office, 2540 Shumard Oak
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20 behalf of the Florida Public Service Commission.

21 ADRIA HARPER, GENERAL COUNSEL; MARY ANNE
22 HELTON, DEPUTY GENERAL COUNSEL, Florida Public Service
23 Commission, 2540 Shumard Oak Boulevard, Tallahassee,
24 Florida 32399-0850, Advisor to the Florida Public
25 Service Commission.

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1 P R O C E E D I N G S

2 CHAIRMAN CLARK: Good morning. It looks like
3 all parties are present this morning. We will call
4 this hearing to order. Today is April 23rd, 9:30
5 a.m., and the hearing is officially called to
6 offered.

7 Would staff please read the notice?

8 MR. MARQUEZ: Good morning, Commissioners. By
9 notice indicated March 6th, 2026, this time and
10 place was set for a hearing in Docket No.
11 20260020-EI. The purpose of the hearing is to
12 receive testimony and exhibits and take final
13 action on FPL's Petition for a Need Determination,
14 as set out more fully in the notice.

15 CHAIRMAN CLARK: All right. Thank you, Mr.
16 Marquez.

17 We will now take appearances beginning with
18 FPL.

19 MR. COX: About morning, Commissioner Clark.
20 William Cox and Christopher Wright appearing on
21 behalf of Florida Power & Light Company.

22 CHAIRMAN CLARK: OPC.

23 MS. CHRISTENSEN: Good morning, Commissioners,
24 Patty Christensen on behalf of the Office of Public
25 Counsel. I would also like to put in an appearance

1 for Charles Rehwinkel. And here today with me is
2 Walt Trierweiler, the Public Counsel.

3 CHAIRMAN CLARK: EDF.

4 MR. SCHEFF WRIGHT: Thank you, Commissioner.
5 Robert Scheffel Wright with the Gardner Bist Law
6 Firm on behalf of the Environmental Defense Fund.
7 I would like to also enter appearances for my law
8 partners John T. Lavia, III, and Timothy J. Perry.

9 Thank you.

10 CHAIRMAN CLARK: Thank you.

11 Staff.

12 MR. MARQUEZ: Carlos Marquez, and I would like
13 to enter an appearance for Shaw Stiller.

14 MS. HELTON: And finally, Mary Anne Helton is
15 here as your Advisor, along with your General
16 Counsel, Adria Harper.

17 CHAIRMAN CLARK: All right Mr. Marquez, any
18 preliminary matters?

19 MR. MARQUEZ: Yes, Commissioner Clark. The
20 parties have reached certain stipulations regarding
21 witness cross-examination and the admission of
22 evidence for the Commission's approval today. To
23 staff's knowledge, these include:

24 One, the testimony of all witnesses will be
25 entered into the record without objection.

1 Two, witnesses will provide their summaries
2 and will be available in the event the
3 Commissioners have any questions.

4 Three, parties waive cross-examination and
5 voir dire of all witnesses.

6 Four, all exhibits and cross exhibits, except
7 those identified by staff as cumulative later in
8 today's hearing, will be entered into the record
9 without objection.

10 And five, parties agree that the complete
11 deposition transcript of FPL witness Miguel Yanes,
12 including errata, will be stipulated as an exhibit
13 and entered into the record.

14 CHAIRMAN CLARK: All right. All the parties
15 in agreement?

16 MR. SCHEF WRIGHT: Yes, sir.

17 MR. COX: Yes, sir.

18 MS. CHRISTENSEN: Yes.

19 CHAIRMAN CLARK: All right. Commissioners, we
20 will vote on the item. I will entertain a motion
21 to approve the stipulations.

22 COMMISSIONER ORTEGA: Motion to approve.

23 CHAIRMAN CLARK: I have a motion.

24 COMMISSIONER PAYNE: Second.

25 CHAIRMAN CLARK: I have a second.

1 Discussion on the matter?

2 All of in favor say aye.

3 (Chorus of ayes.)

4 CHAIRMAN CLARK: Opposed?

5 (No response.)

6 CHAIRMAN CLARK: Motion carries.

7 All right. Next we are going to hear opening
8 statements. I assume we did not waive or stipulate
9 those. Each party has five minutes, and we will
10 begin with FPL.

11 MR. COX: Thank you, Commissioner Clark and
12 Commissioners. Good to be with you today.

13 FPL has petitioned the Commission for an
14 affirmative determination of need for the
15 construction and operation of four transmission
16 lines that collectively form the proposed
17 Andytown-Oasis Transmission Lines Project, which I
18 will refer to as the AOP or the AOP project.

19 In its 2025 annual transmission assessment,
20 FPL determined that the transmission system serving
21 Miami-Dade County will violate mandatory NERC
22 reliability standards by December 2033. FPL
23 evaluated alternative electrical solutions and
24 determined that the AOP project is the most
25 cost-effective transmission alternative that fully

1 resolves that need. The evidence in this case
2 demonstrates that the project must be completed by
3 December of 2033, with phased construction between
4 2031 and 2033. And that's to maintain NERC
5 compliance and to preserve reliable service for our
6 customers.

7 Importantly, the evidence in this case
8 demonstrate that this petition and the need for the
9 project complies with the very specific expressed
10 criteria for the transmission line need
11 determination mandated by the Florida Legislature.

12 Importantly, Commissioners, no party disputes
13 the need for the project or the requirements to
14 comply with these mandatory NERC reliability
15 standards. Likewise, no party refutes that the AOP
16 solves the identified reliability violations.
17 Further, no party offers a technically supported or
18 cost-effective alternative that would timely
19 resolve these reliability violations by the
20 required timeframe.

21 Simply put, there is no evidence challenging
22 the need for the project or that the AOP resolves
23 the need. Instead, EDF asked you to venture
24 outside the expressed criteria handed down to this
25 commission by the Florida Legislature and spin this

1 off into a federal policy transmission policy
2 debate. They seek to turn this state need petition
3 case into a broad federal proceeding centered
4 around the Florida Reliability Coordinating
5 Council, the FRCC, and the FERC Order 1000 Regional
6 Transmission Planning Process, and the future
7 implementation of FERC Order 1920. Those arguments
8 fall outside the scope of the Florida Legislature's
9 statutory need criteria and, therefore, are outside
10 the scope of this docket.

11 The AOP itself is an FPL only project required
12 to meet a very specific local need in Miami-Dade
13 County. It is not, by definition, a regional
14 multi-utility project that is subject to the FERC
15 Order 1000 FRCC process.

16 EDF's FERC Order 1920 arguments regarding
17 regional transmission planning, are not just
18 misplaced, Commissioners. In fact, they are
19 premature. FPL's rebuttal testimony establishes
20 that the Florida FERC Order 1920 compliance filing
21 is not due until June 12th of 2026, and that the
22 first FERC Order 1920 planning cycle would not
23 begin until January 1st of 2028, including no later
24 than January 1, 2031, and that timing point
25 matters.

1 FPL's evidence demonstrates that the failure
2 to complete this project on time would risk
3 involuntary load shedding of customers in
4 Miami-Dade County if the AOP project is not
5 implemented by December of 2033. The Commission
6 should not take that gamble with customer
7 reliability urged by EDF, and even by the Office of
8 Public Counsel, by delaying this decision,
9 especially where the need is localized, documented
10 and undisputed.

11 The Commission's duty under Section 403.537,
12 the need determination statute, is to determine
13 whether there is a need for the proposed
14 transmission lines under the statutory criteria,
15 including the demand for electric system
16 reliability and integrity and abundant low-cost
17 electrical energy for the economic well-being of
18 Florida's residents.

19 The unrefuted record in this case demonstrates
20 that FPL has met that burden. EDF's generalized
21 policy criticisms, broad advocacy about federal
22 regional transmission planning reform and
23 speculation about future regional processes and
24 projects are beyond the scope of this proceeding,
25 Commissioners, and certainly not a basis to deny a

1 transmission project required to resolve undisputed
2 violations of the mandatory NERC reliability
3 standards.

4 For these reasons, FPL respectfully requests
5 that you approve FPL's petition for an affirmative
6 determination of need for the Andytown-Oasis
7 Transmission Lines Project, purpose to Section
8 403.537 of the Florida Statutes to ensure reliable
9 electric service and low-cost energy for the
10 benefit of FPL's customers.

11 Thank you, Commissioners.

12 CHAIRMAN CLARK: Thank you, Mr. Cox.

13 Ms. Christensen.

14 MS. CHRISTENSEN: Good morning, Commissioners.
15 This case is about ensuring that FPL has provided
16 all of the information that the Commission needs to
17 determine whether all of the elements of Section
18 403.537, Florida Statutes, are met. Given the
19 accelerated 45-day schedule from filing to hearing,
20 the opportunity to fully develop evidence through
21 discovery regarding the elements of the statute are
22 severely hampered. These elements include whether
23 the proposed AOP is needed when taking into account
24 the need for abundant low-cost electric energy to
25 assure the economic well-being of the citizens of

1 the state.

2 When the petition does not include all of the
3 information necessary for the Commission to make a
4 fully informed decision, at a minimum, the
5 proceeding should allow for additional time for
6 that information to be provided.

7 As we sit here today, OPC believes that after
8 reviewing all of the evidence in this case, the
9 Commission will determine that it needs additional
10 information before making its decision.

11 Thank you.

12 CHAIRMAN CLARK: Thank you, Ms. Christensen.
13 Mr. Wright.

14 MR. SCHEF WRIGHT: Thank you, Mr. Chairman and
15 Commissioners. Good morning. Schef Wright on
16 behalf of the Environmental Defense Fund and its
17 members who are retail customers of FPL. Thank you
18 for the opportunity to address you and to present
19 our case to you today -- or actually in our
20 post-hearing brief as it's turning how the out.

21 I want to make clear from the outset that the
22 Environmental Defense Fund is not opposed to new
23 transmission lines or related facilities.
24 Consistent with EDF's primary purposes of promoting
25 sound environmental and public policy decisions

1 that serve the public interest by reducing
2 pollution and enhancing the efficient provision of
3 low-cost energy services throughout the U.S. and
4 the world economies, the EDF strongly supports
5 beneficial cost-effective transmission projects
6 based on robust, thorough and complete
7 consideration and analyses of all available options
8 to meet the needs of a utility's customers most
9 cost-effectively. These are, or should be, the
10 goals of prudent utility planning and service, and
11 we believe that the Commission supports these goals
12 as well.

13 The Commission's jurisdiction in this
14 proceeding includes not only the reliability need
15 criterion in Section 403.537. It also includes the
16 criterion that proposed transmission lines should
17 provide abundant, low-cost electrical energy to
18 assure the economic well-being of the residents of
19 Florida.

20 Your jurisdiction further includes specific
21 jurisdiction over the planning, development and
22 maintenance of a coordinated electric power grid
23 throughout Florida to assure an adequate and
24 reliable source of energy and the avoidance of
25 further uneconomic duplication of generation,

1 transmission and distribution facilities. Of
2 course, the Commission's overarching statutory
3 mandate is to regulate public utilities in the
4 public interest broadly construed.

5 The EDF decided to oppose the AOP in this
6 proceeding because the proposed project is not
7 based on a robust, thorough or complete analysis of
8 the many options available to FPL that could at
9 least reduce the scope of the AOP, reduce costs to
10 FPL's customers, and serve the needs of Floridians
11 for abundant low-cost electrical energy while
12 meeting all reliability needs more cost-effectively
13 than the AOP. The evidence will show that FPL did
14 not meaningfully consider, did not conduct any
15 benefit cost analysis or cost-effectiveness
16 analysis at all of any options to the AOP other
17 than two other similar high voltage transmission
18 lines. FPL failed to meaningfully analyze many
19 other options, including the carrying capacity of
20 its existing facilities, using known and normally
21 applied emergency ratings, additional technologies
22 and operational practices.

23 Notably, Commissioners, FPL did not consider
24 any potential combinations of any of the above
25 alternative technologies or operational measures in

1 its analyses supporting its decision to pursue the
2 AOP. These options could have deferred the time
3 the project might be needed, when additional
4 capacity might be needed. It could -- might have
5 avoided the need all together or identified a
6 combination of the above measures that would have
7 provided some -- identical reliability benefits at
8 lower cost. FPL could have but did not perform any
9 normal benefit cost or cost-effectiveness analyses
10 of these options. FPL did not evaluate any
11 regional options.

12 While the EDF is not asking the Commission to
13 adjudicate any issue with respect to orders of the
14 Federal Energy Regulatory Commission, the EDF does
15 strongly believe that FPL has failed to prudently
16 consider the planning requirements of both existing
17 currently effective and future FERC orders,
18 including Order 1000 and Order 1920.

19 FPL's failures to conduct robust, thorough and
20 complete analyses of all available options is prima
21 facie evidence of FPL's failure to plan its
22 transmission system prudently and, accordingly, the
23 Commission should deny FPL's petition.

24 The EDF could have possibly have identified
25 and analyzed options summarized above, and possibly

1 other options, but the combination of the
2 extraordinarily short and inadequate time, 13 days,
3 for EDF to prepare and present its case from first
4 seeing FPL's case to the date testimony was due
5 deprived the EDF of any meaningful opportunity to
6 do so. These limitations also deprived the
7 Commission of any opportunity to receive additional
8 relevant evidence well within your jurisdiction.

9 The EDF strongly believes that the OEP and the
10 other procedural rulings have deprived the EDF of
11 its rights under Section 120.57, and basic norms of
12 due process. The EDF objects to the OEP and the
13 denials of our motions to alter the schedule, and
14 we hereby state these objections for the record.

15 Finally, notwithstanding our differences,
16 which are many, I want to express my and EDF's
17 genuine gratitude to FPL, to you, to the staff and
18 to the Public Counsel for working out the process
19 that you have approved by approving the stipulation
20 earlier. This will make for a cleaner process. It
21 will definitely reduce pain on all sides that would
22 otherwise have been experienced through lengthy
23 tedious cross-examination today, and we look
24 forward to submitting our briefs at the conclusion
25 of the hearing.

1 Thank you very much.

2 CHAIRMAN CLARK: Thank you very much, Mr.
3 Wright.

4 Is there any public testimony today? Any
5 member of the audience who wishes to testify in
6 this hearing?

7 All right. Seeing none, we will move into
8 exhibits. Staff.

9 MR. MARQUEZ: Staff has compiled a
10 Comprehensive Exhibit List, which includes the
11 prefiled exhibits attached to the witnesses'
12 testimonies and a number of staff exhibits. The
13 list was provided to all parties, the Commissioners
14 and the court reporter.

15 The CEL is premarked for identification as the
16 first hearing exhibit, and the other exhibits
17 should be marked as set forth on the CEL.

18 CHAIRMAN CLARK: All right. The exhibits are
19 so marked.

20 (Whereupon, Exhibit Nos. 1-191 were marked for
21 identification.)

22 MR. MARQUEZ: Commissioners, staff requests
23 that the CEL, marked as Exhibit No. 1, be entered
24 into the record at this time.

25 CHAIRMAN CLARK: Any objections? So ordered.

1 (Whereupon, Exhibit No. 1 was received into
2 evidence.)

3 MR. MARQUEZ: Staff requests that Exhibit No.
4 2, FPL's notices of publication, be entered into
5 the record at this time.

6 CHAIRMAN CLARK: Any objections? So ordered.

7 (Whereupon, Exhibit No. 2 was received into
8 evidence.)

9 MR. MARQUEZ: The prefiled exhibits should be
10 moved into the record at the conclusion of each
11 witness' questioning. However, staff requests that
12 our hearing exhibits, Exhibit Nos. 37 through 48,
13 be moved into the record at this time as set forth
14 in the CEL.

15 CHAIRMAN CLARK: All the parties had a chance
16 to review the documents. Any objections?

17 Seeing none, so ordered.

18 (Whereupon, Exhibit Nos. 37-48 were received
19 into evidence.)

20 MR. MARQUEZ: Next, pursuant to the
21 cross-examination stipulations mentioned earlier
22 today, staff requests that Exhibit No.s 49 through
23 173 and 178 through 191 be moved into the record.
24 Staff notes that Exhibit Nos. 174 through 177 are
25 cumulative of Exhibit Nos. 10 through 13, and,

1 thus, should not be entered.

2 CHAIRMAN CLARK: All right. Any objections?

3 All in agreement? All right. So ordered.

4 (Whereupon, Exhibit Nos. 49-173 & 178-191 were
5 received into evidence.)

6 MR. MARQUEZ: Commissioner, the parties have
7 also agreed to enter a hearing exhibit today, which
8 would be the deposition of Miguel A. Yanes from
9 April 3rd, 2026. That exhibit should be marked as
10 Exhibit No. 192, and entered into the record at
11 this time.

12 CHAIRMAN CLARK: All in agreement? So
13 ordered.

14 (Whereupon, Exhibit No. 192 was marked for
15 identification and received into evidence.)

16 CHAIRMAN CLARK: All right. That brings us to
17 witness testimony. I think we are going to take
18 all of the witnesses at one time -- Mr. Cox, did
19 you have --

20 MR. COX: No, that's fine. Thank you, sir.

21 CHAIRMAN CLARK: Okay. We are going to move
22 into the witness testimony. Before we begin, I
23 would like to swear all the witnesses in that are
24 going to be testifying today. So if you are here
25 to testify, would you please stand and raise your

1 right hand?

2 (Whereupon, Chairman Clark administered the
3 oath.)

4 CHAIRMAN CLARK: All right. So ordered.
5 All right. We will begin.

6 FPL.

7 MR. COX: Thank you, Commissioner Clark.

8 Commissioners, FPL calls its witness Miguel A.
9 Yanes to the stand.

10 Commissioner Clark, just one clarification
11 question from the previous staff exhibits. We just
12 wanted to make sure that the errata would be
13 included with that deposition transcript.

14 MR. MARQUEZ: That's right. I did forget to
15 mention that, but, yes, it was supposed to be in
16 accordance with the stipulations.

17 MR. COX: Okay. I assumed so. We just wanted
18 to make sure. Thank you.

19 CHAIRMAN CLARK: No problem.

20 MR. COX: Sorry to interrupt the flow there.

21 Whereupon,

22 MIGUEL A. YANES

23 was called as a witness, having been previously duly
24 sworn to speak the truth, the whole truth, and nothing
25 but the truth, was examined and testified as follows:

1

EXAMINATION

2 BY MR. COX:

3 Q Mr. Yanes, can you please state your name for
4 the record?

5 A Miguel A. Yanes.

6 Q And, Mr. Yanes, have you been sworn in for
7 this hearing?

8 A Yes.

9 Q What is your business address?

10 A 4200 West Flagler Street, Miami, Florida,
11 33134.

12 Q And by whom are you employed and in what
13 capacity?

14 A Florida Power & Light. My current role, I am
15 the Senior Director for Transmission and Substation
16 Field Operations.

17 Q And on whose behalf are you testifying in this
18 proceeding with your direct testimony?

19 A Florida Power & Light.

20 Q Mr. Yanes, did you cause to be filed on March
21 11th, 2026, 16 pages of direct testimony in this
22 proceeding?

23 A Yes.

24 Q Today, do you have any changes or corrections
25 to your direct testimony?

1 A No.

2 Q If I were to ask you the same questions today
3 as contained in your prefiled direct testimony as filed
4 on March 11th, 2026, would your answers be the same?

5 A Yes.

6 MR. COX: Commissioners, FPL requests that
7 Mr. Yanes' March 11th, 2026, prefiled direct
8 testimony be inserted in the record as though read.

9 CHAIRMAN CLARK: So ordered.

10 (Whereupon, prefiled direct testimony of
11 Miguel A. Yanes was inserted.)

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**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 20260020-EI**

**FLORIDA POWER & LIGHT COMPANY
DIRECT TESTIMONY OF MIGUEL A. YANES**

Filed: March 11, 2026

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1

I. INTRODUCTION AND SUMMARY

2

3 **Q. Please state your name and business address.**

4 A. My name is Miguel A. Yanes. My business address is 4200 W. Flagler Street, Miami,
5 Florida 33134.

6 **Q. By whom are you employed and what position do you hold?**

7 A. I am employed by Florida Power & Light Company (“FPL” or the “Company”) as
8 Senior Director, Transmission Services and Planning.

9 **Q. Please describe your duties and responsibilities in that position.**

10 A. My responsibilities include overseeing the Transmission and Distribution Planning
11 organization, which develops long-term system plans to address load growth, North
12 American Electric Reliability Corporation (“NERC”) Reliability Standards, and system
13 performance. I have also served on various NERC groups, such as the NERC
14 Resources Subcommittee, the NERC Frequency Working Group, Florida Reliability
15 Coordinating Council (“FRCC”) Chair for Interregional Transfer Capability Study.
16 Currently, I am a member of the North American Transmission Forum, Chair of the
17 FRCC Federal Energy Regulatory Commission (“FERC”) Task Forces for Order 881
18 and Order 1920, and NERC Certified Reliability Coordinator.

19 **Q. Please describe your educational background and professional experience.**

20 A. I have a Bachelor of Science degree in Electrical Engineering from Florida
21 International University. I joined FPL in 2002 and have more than 24 years of technical
22 and managerial experience gained from serving in a variety of positions within FPL.
23 Prior to my current position, I served as FPL’s Senior Manager of System Operations

1 responsible for ensuring the safe and reliable performance of the FPL Bulk Electric
2 System (“BES”), which included the real-time operation of FPL’s generation,
3 transmission, and substation assets and coordination with the FRCC and its members.

4 **Q. Are you sponsoring any exhibits in this case?**

5 A. Yes. I am sponsoring the following exhibits, which are attached to my direct testimony.

- 6 • Exhibit MAY-1 FPL Electrical Transmission Grid Map
- 7 • Exhibit MAY-2 Map of Study Area with Existing Facilities and Proposed
8 Project
- 9 • Exhibit MAY-3 Andytown-Oasis Expected Construction Schedule
- 10 • Exhibit MAY-4 List of Contingencies

11 **Q. What is the purpose of your testimony?**

12 A. The purpose of my testimony is to sponsor and support FPL’s request for a
13 determination of need for the Andytown-Oasis Transmission Lines project (“AOP” or
14 “Project”). Specifically, my testimony presents the following information in support
15 of the AOP:

- 16 • General overview of the FPL transmission system;
- 17 • A general description of the AOP including the design and operating voltage of
18 the proposed transmission lines, the starting and ending points of the lines, the
19 approximate cost of the AOP, and the projected in-service date;
- 20 • Discussion of FPL’s transmission planning process;
- 21 • The specific conditions, contingencies, and factors that demonstrate the need
22 for the AOP, including the transmission reliability benefits of the AOP;

- 1 • The alternatives to the AOP that were evaluated and rejected by FPL in favor
2 of the AOP; and
- 3 • The adverse consequences to FPL’s electric system and customers if the AOP
4 is delayed or denied.

5 **Q. Please summarize your testimony.**

6 A. FPL is proposing to build four new transmission lines: (1) one 500 kV line starting at
7 FPL’s existing Andytown substation in Broward County and ending at FPL’s planned
8 Oasis substation in Miami-Dade County; (2) one 500 kV line starting at FPL’s existing
9 Quarry substation in Miami-Dade County and ending at FPL’s planned Oasis
10 substation in Miami-Dade County; (3) one 230 kV line starting at FPL’s planned Oasis
11 substation in Miami-Dade County and ending at FPL’s existing Quarry substation in
12 Miami-Dade County; and (4) one 230 kV line starting at FPL’s planned Oasis
13 substation in Miami-Dade County and ending at FPL’s existing Levee substation in
14 Miami-Dade County. FPL’s analysis of multiple transmission alternatives identified
15 the AOP as the most cost-effective and efficient solution to: (a) address future thermal
16 overloads and low voltage conditions in Miami-Dade County under contingency events
17 in compliance with mandatory NERC Reliability Standards TPL-001-5.1¹ and NUC-
18 001-4²; (b) maintain transmission reliability for FPL customers in Miami-Dade
19 County; and (c) increase power transfer capability of the transmission system to support
20 growing demand in Miami-Dade County.

¹ NERC Reliability Standard TPL-001-5.1 defines the scenarios and expected levels of system performance the BES must comply within the long-term planning horizon.

<https://www.nerc.com/globalassets/standards/reliability-standards/tpl/tpl-001-5.1.pdf>

² NERC Reliability Standard NUC-001-4 establishes coordination requirements between nuclear plant generator operators and transmission entities to ensure reliable long-term system planning and operation.

<https://www.nerc.com/globalassets/standards/reliability-standards/nuc/nuc-001-4.pdf>

1 The AOP project accounts for the growing electric demand in Miami-Dade County³,
2 in compliance with NERC Reliability Standards and meeting transmission system
3 resiliency needs to address the rising need for low-cost electricity and support
4 economic well-being of residents across Miami-Dade County. The estimated
5 construction cost for the Project is \$781.89 million. The final cost of the Project is
6 subject to the ultimate line routing, length, and conditions of certification required by
7 the Transmission Line Siting Board. This Project will maintain transmission reliability
8 in Miami-Dade County by minimizing the exposure to double contingency events and
9 provide hardened infrastructure capable of withstanding major storms.

11 II. OVERVIEW OF FPL'S TRANSMISSION SYSTEM

13 Q. Please describe FPL's transmission system.

14 A. The FPL transmission system is comprised of approximately 9,700 circuit miles of
15 transmission lines and 932 substations that integrate FPL's generation and distribution
16 system. FPL's transmission system interconnects with a larger transmission network,
17 which includes other utilities in Florida and the Eastern Interconnection ("EI")
18 transmission network. The EI reaches from central Canada eastward to the Atlantic
19 coast, south to Florida and west to the foot of the Rockies. The EI has multiple points
20 of interconnection with other utilities that enable power to be exchanged during
21 planned and unplanned scenarios.

³ Miami-Dade County represents nearly one quarter of FPL's total system load in 2025.

1 **Q. How does FPL design its transmission system?**

2 A. The FPL transmission system is designed to integrate all FPL generation resources to
3 serve FPL’s customers and to meet FPL’s firm long-term transmission service
4 obligations in a reliable and cost-effective manner. FPL plans, designs, and operates
5 its transmission system in accordance with requirements established by NERC
6 Reliability Standards. NERC Reliability Standard TPL-001-5.1 defines the scenarios
7 and expected levels of system performance for the BES over the long-term planning
8 horizon. In general, the transmission system must remain stable, with both thermal and
9 voltage limits maintained within applicable facility ratings for each contingency
10 category listed on Table 1 of NERC Reliability Standard TPL-001-5.1.⁴ As part of its
11 transmission planning criteria, FPL complies with the system performance
12 requirements of the NERC Reliability Standard TPL-001-5.1.

13 **Q. Please provide a brief description of the existing load and electric characteristics.**

14 A. FPL manages the most expansive Transmission & Distribution (“T&D”) grid in the
15 state of Florida. FPL’s T&D grid currently serves more than 6 million customer
16 accounts representing 12 million people in 43 counties in peninsular and Northwest
17 Florida. FPL’s all-time summer peak demand is 28,733 MWh on July 31, 2025, and
18 the all-time winter peak is 27,668 MWh on February 2, 2026. An overview of FPL’s
19 existing electrical transmission network indicating the general location of generating
20 plants, substations, and transmission lines is shown in Exhibit MAY-1.

⁴ NERC Reliability Standard TPL-001-5.1 is located at <https://www.nerc.com/globalassets/standards/reliability-standards/tpl/tpl-001-5.1.pdf>. The referenced Table 1 is on Pages 21-29 of this standard.

III. DESCRIPTION OF THE AOP

1
2
3 **Q. Please describe the proposed AOP transmission lines for which FPL is seeking a**
4 **determination of need in this docket.**

5 A. The AOP will consist of building four new transmission lines: (1) one 500 kV line
6 starting at FPL's existing Andytown substation in Broward County and ending at FPL's
7 planned Oasis substation in Miami-Dade County; (2) one 500 kV line starting at FPL's
8 existing Quarry substation in Miami-Dade County and ending at FPL's planned Oasis
9 substation in Miami-Dade County; (3) one 230 kV line starting at FPL's planned Oasis
10 substation in Miami-Dade County and ending at FPL's existing Quarry substation in
11 Miami-Dade County; and (4) one 230 kV line starting at FPL's planned Oasis
12 substation in Miami-Dade County and ending at FPL's existing Levee substation in
13 Miami-Dade County.

14
15 The entire AOP will serve existing and future FPL distribution substations in FPL's
16 service area and increase capacity of the transmission network with resilient, hardened
17 500 kV and 230 kV lines. This Project is the most cost-effective and efficient solution
18 to: (a) address future thermal overloads and low voltage conditions in Miami-Dade
19 County under contingency events in compliance with NERC Reliability Standards
20 TPL-001-5.1 and NUC-001-4; (b) maintain transmission reliability for FPL customers
21 in Miami-Dade County; and (c) increase power transfer capability of the transmission
22 system to support growing demand in Miami-Dade County.
23

1 Exhibit MAY-2, Page 1 is a map showing the AOP, featuring the study area for the
2 project with the existing facilities in the area and the general location of the proposed
3 project lines. Page 2 of Exhibit MAY-2 is a more detailed system view of the study
4 area with the existing and proposed project facilities.

5 **Q. Why are the four lines needed for this project and could FPL stagger the**
6 **implementation of these lines for the AOP beyond 2033?**

7 A. The four lines are necessary to address the identified NERC Reliability Standards TPL-
8 001-5.1 and NUC-001-4 violations beginning in 2033 as identified in the 2025
9 transmission planning studies. While FPL plans to stagger the completion dates of the
10 AOP lines in multiple phases between 2031 and 2033, this project must be completed
11 by December 2033 in order to maintain compliance with the NERC Reliability
12 Standards based on the most recent transmission planning assessment studies.

13 **Q. Why is the AOP project a mix of 500 kV and 230 kV lines?**

14 A. The proposed 500 kV lines provide increased transfer capabilities into Miami-Dade
15 County while the 230 kV transmission lines enable effective distribution closer to the
16 load demand area in Miami-Dade County.

17 **Q. What is FPL's timetable for permitting, right-of-way acquisition, design, and**
18 **construction of the AOP?**

19 A. Exhibit MAY-3 provides an indicative schedule of permitting, right-of-way
20 acquisition, design, and construction for the AOP.

21 **Q. What is FPL's estimated construction cost of the AOP?**

22 A. The estimated construction cost of the AOP is \$781.89 million (\$699.8 million
23 Cumulative Present Value Revenue Requirement ("CPVRR")).

1 **Q. What is the projected in-service date for the AOP?**

2 A. The projected in-service date is December 2033.

3

4

IV. FPL PLANNING PROCESS

5

6 **Q. How does FPL determine the need for new transmission lines?**

7 A. FPL identifies and analyzes the need for new transmission lines through its annual
8 transmission planning process. The transmission planning process consists of five major
9 steps: (1) the preparation of system models, (2) the assessment of the transmission
10 system performance to comply with NERC Reliability Standards, (3) the development
11 and evaluation of transmission expansion alternatives, (4) the selection and approval of
12 the preferred alternatives, and (5) the incorporation of the expansion plan into the
13 FRCC Regional Planning Process.

14

15 FPL plans, designs, and operates its transmission system to comply with NERC
16 Reliability Standards. NERC Reliability Standard TPL-001-5.1 defines scenarios and
17 expected levels of system performance that the BES must comply with in the long-term
18 planning horizon. In general, the system must remain stable, and both thermal and
19 voltage limits must stay within applicable facility ratings for each of the operating
20 contingency categories listed on Table 1 of NERC Reliability Standard TPL-001-5.1.
21 The transmission planning process incorporates meeting the NERC Reliability
22 Standards as well as proposed projects required within short-term planning horizons to
23 address additional needs across the BES. These include changes of power transfers

1 across areas associated with transmission service, generator interconnection requests
2 or generation retirements, growing load demand, and maintaining overall transmission
3 reliability of the BES, such as providing loop service to customers and the addition of
4 relay points on transmission lines with several distribution stations. The planned
5 transmission system, with its expected loads and transfers, must be stable and within
6 applicable ratings for all categories of contingency scenarios. The design of new
7 transmission connections should consider and minimize, to the extent practical, the
8 adverse consequences of all contingency categories and maintain transmission
9 reliability.

10 **Q. Did FPL perform any studies to determine the need for the AOP?**

11 A. Yes. Transmission assessment studies were conducted by FPL in 2025. These studies
12 have identified that by 2033, FPL's existing transmission network will not be able to
13 support the growing load demand in Miami-Dade County. These potential system
14 limitations will require additional facilities to meet transmission reliability and increase
15 transfer capability for Miami-Dade County as shown in Exhibit MAY-4.

16 **Q. Please describe the contingency scenarios identified that support the need for
17 proposed AOP Project.**

18 A. FPL transmission assessment studies analyzed seven contingency categories
19 (scenarios) that are explicitly defined by NERC Reliability Standard TPL-001-5.1 on
20 Table 1 (Category P1 through P7). Each category includes single-contingency or
21 multiple-contingency events with specific overload and/or under-voltage conditions to
22 identify the potential risk of cascading interruptions and/or instability in the
23 transmission system. As a result, FPL transmission assessment studies in 2025

1 identified the future contingency scenarios and corresponding system stability
2 challenges (*i.e.*, thermal overload and low voltage conditions) that must be addressed
3 as shown in Exhibit MAY-4 in order to maintain compliance with the NERC Reliability
4 Standards. These identified future contingency scenarios serve as the basis for the AOP
5 need.

6

7

V. NEED FOR THE PROJECT

8

9 **Q. Please describe the needs addressed and benefits provided by the AOP.**

10 A. The construction of the AOP addresses the growing needs of Miami-Dade County
11 customers, while also providing overall system stability and benefits. Specifically, the
12 Project will:

- 13 • Address future thermal overloads and low voltage conditions in Miami-Dade
14 County under contingency events in compliance with NERC Reliability
15 Standards TPL-001-5.1 and NUC-001-4;
- 16 • Maintain transmission reliability for FPL customers in Miami-Dade County;
- 17 • Increase power transfer capability of the transmission system to support
18 growing demand in Miami-Dade County; and
- 19 • Provide resilient, hardened transmission service to the area.

20

21 Over the past three years (2023-2025), FPL's service area in Miami-Dade County has
22 reported summer peak loads between 6,014 MW and 6,239 MW. FPL's 2025 forecast
23 projects that by 2033, the summer peak load in Miami-Dade County will be

1 approximately 7,200 MW.⁵ As a result of the growing customer base and electric
2 demand loads in Miami-Dade County, FPL's transmission system is projected to
3 exceed facility ratings under several contingency scenarios. These studies have
4 identified that by 2033, FPL's existing transmission network will not be able to support
5 the growing load demand in Miami-Dade County, and a need for a new transmission
6 solution is required to maintain transmission reliability in the area. The AOP will
7 address NERC Reliability Standard TPL-001-5.1 transmission reliability deficiencies
8 and provide a resilient, hardened path from Broward County into Miami-Dade County.

9 **Q. Is the AOP the most cost-effective alternative to meet the identified need based**
10 **on the criteria in the applicable transmission line need determination statute,**
11 **Section 403.537, Florida Statutes?**

12 A. Yes. As I will discuss further, the AOP is the most cost-effective alternative, taking
13 into account the demand for electricity, maintaining transmission reliability and
14 integrity, and addressing the need for abundant, low-cost electrical energy to assure the
15 economic well-being of the residents of this state.

17 VI. DISCUSSION OF TRANSMISSION ALTERNATIVES

18
19 **Q. Did FPL consider transmission alternatives to the AOP?**

20 A. Yes, FPL considered transmission alternatives to the AOP to meet the identified need.

⁵ As a result of the growing load demand in Miami-Dade County for 2033, FPL's generation for Miami-Dade County is expected to remain flat at approximately 3,160 MW while the forecasted need for transmission import is expected to increase by 1,000 MW.

1 **Q. Please describe the transmission alternatives that were considered and explain the**
2 **reasons why they were rejected.**

3 A. FPL evaluated the following two transmission alternatives to the proposed AOP
4 Project:

5 Alternative I: The Conservation-Oasis Project (“Alternative I Project”) consists of
6 building four new transmission lines: one 500 kV line starting at FPL’s existing
7 Conservation substation in Broward County ending at FPL’s planned Oasis substation
8 in Miami-Dade County; one 500 kV line starting at FPL’s existing Quarry substation
9 in Miami-Dade County ending at FPL’s planned Oasis substation in Miami-Dade
10 County; one 230 kV line starting at FPL’s planned Oasis substation ending at FPL’s
11 existing Quarry substation; and one 230 kV line starting at FPL’s planned Oasis
12 substation in Miami-Dade County ending at FPL’s existing Flagami substation in
13 Miami-Dade County. Similar to the AOP, the newly proposed transmission lines
14 would use portions of existing FPL right-of-way corridors, with additional right-of-
15 way acquisition being required to complete the projects and address the anticipated
16 transmission reliability limitations concerns by 2033. The estimated construction cost
17 of this alternative is \$1,004.29 million (\$925.2 million CPVRR). This alternative was
18 rejected for several reasons. The cost of this alternative is approximately \$222.4 million
19 higher than the AOP. Additionally, this alternative presents significant routing and
20 permitting challenges through densely populated areas in Miami-Dade County where
21 FPL has limited right-of-way for new transmission lines.

22

1 Alternative II: The Andytown-Oasis Two Circuits Project (“Alternative II Project”)
2 consists of building four new transmission lines: two 500 kV lines starting at FPL’s
3 existing Andytown substation in Broward County ending at FPL’s planned Oasis
4 substation in Miami-Dade County; one 230 kV line starting at FPL’s planned Oasis
5 substation to FPL’s existing Levee substation; and one 230 kV line starting at FPL’s
6 planned Oasis substation in Miami-Dade County ending at FPL’s existing Flagami
7 substation in Miami-Dade County. Similar to the AOP, the newly proposed
8 transmission lines for the Alternative II Project would use portions of existing FPL
9 right-of-way corridors, with additional right-of-way acquisition being required to
10 complete the projects and address the anticipated transmission reliability limitations
11 concerns by 2033. The estimated construction cost of this alternative is \$974.19 million
12 (\$876.6 million CPVRR). This alternative was rejected for multiple reasons. The cost
13 of this alternative is approximately \$192.3 million higher than the AOP. This
14 alternative presents significant routing and permitting challenges through densely
15 populated areas in Miami-Dade County where FPL has limited right-of-way for new
16 transmission lines.

18 **VII. ADVERSE CONSEQUENCES OF DELAY OR DENIAL OF THE AOP**

19
20 **Q. Would there be adverse consequences to FPL’s customers in the AOP Service**
21 **Area if the AOP is not timely approved?**

22 **A.** Yes. If the AOP is not built by December 2033, the transmission system would
23 experience potential overloads and low voltage conditions under contingency events,

1 resulting in multiple NERC Reliability Standard violations. In addition, sufficient
2 transmission capacity would not be available to serve the existing and future customers
3 in Miami-Dade County. Further, by virtue of the growing loads in the area, the
4 transmission system and FPL customers in the area would experience negative impacts
5 to their transmission reliability, such as NERC Reliability Standard violations,
6 transmission system overloads, low voltage conditions, and customer load shedding
7 due to insufficient transmission capacity.

8 **Q. Should the Florida Public Service Commission (“Commission”) approve the need**
9 **for the AOP?**

10 A. Yes. For all the reasons described above, the Commission should determine that there
11 is a need for the AOP to preserve transmission reliability and integrity in the area and
12 to maintain low-cost electrical energy for the economic well-being of the residents of
13 Florida.

14 **Q. Does this conclude your direct testimony?**

15 A. Yes.

1 BY MR. COX:

2 Q Mr. Yanes, did you also have Exhibits MAY-1
3 through MAY-4 attached to your prefiled direct
4 testimony?

5 A Yes.

6 Q Mr. Yanes, are you also sponsoring Exhibit A
7 to FPL's petition in this proceeding, including all the
8 attachments and appendices to Exhibit A?

9 A Yes.

10 Q Do you have any changes or corrections to your
11 exhibits attached to your testimony or to Exhibit A
12 exhibits?

13 A No.

14 MR. COX: Commissioners, Exhibits MA-1 --
15 MAY-1 through MAY-4 and Exhibit A to FPL's
16 petitions have been marked on the list of hearing
17 exhibits on staff's comprehensive exhibit list as
18 Exhibit Nos. 3 through 7.

19 BY MR. COX:

20 Q Mr. Yanes, do you have -- have you prepared a
21 summary of your prefiled direct testimony?

22 A Yes.

23 Q Could you please present that summary to the
24 Commission at this time?

25 A Yes.

1 Good morning, Commissioners. My name is
2 Miguel Yanes. I am the Senior Director of Transmission
3 and Substation Field Operations for Florida Power &
4 Light.

5 At the time I filed the direct testimony, I
6 served as the Senior Director of Transmission --
7 Transmission Services and Planning, where I was
8 responsible for the organization that developed
9 long-term transmission plans, addresses local growth,
10 NERC reliability standard compliance and system
11 performance.

12 My direct testimony supports FPL's request for
13 determination of need for the Andytown-Oasis
14 Transmission Lines Project, or AOP.

15 As part of FPL's 2025 annual transmission
16 planning process, results show that, in 2033, the
17 existing transmission system serving Miami-Dade County
18 will experience thermal overloads and low-voltage
19 conditions resulting in violations of mandatory NERC
20 reliability standards with no new transmission
21 facilities placed in service.

22 These reliability deficiencies are driven by
23 continued load growth in Miami-Dade County, a
24 geographically constrained load pocket in the southern
25 system -- of FPL's transmission system, combined with

1 limited north to south transfers capability and voltage
2 support. Without additional transmission
3 reinforcements, the system in this area will be unable
4 to maintain NERC reliability performance levels.

5 The AOP adds two new 500 kV lines and two new
6 230 kV lines to strengthen the transmission network,
7 increases transfers into Miami-Dade County, and provides
8 a hardened transmission path capable of withstanding
9 severe weather events.

10 While FPL considered non-transmission
11 solutions and advanced transmission technologies, none
12 could reliably or feasibly address the identified need.
13 The AOP is the most cost-effective and efficient
14 solution to meet the projected need.

15 If the AOP is delayed or denied, customers of
16 Miami-Dade County would face increased reliability risk
17 for their electric service, including the potential for
18 involuntary load shedding in 2033.

19 For these reasons, the record supports the
20 approval of AOP as necessary to retain reliable electric
21 service with low-cost energy and support continued
22 customer growth in the area.

23 Thank you very much for you are time.

24 **Q Thank you, Mr. Yanes.**

25 CHAIRMAN CLARK: Thank you, Mr. Yanes.

1 The parties have waived cross-examination, so,
2 Commissioners, do you have anything?

3 Mr. Cox, I am sorry, did you have something?

4 MR. COX: No, I do not. I was just going to
5 say he is tendered for your questions, but thank
6 you.

7 CHAIRMAN CLARK: I am sorry. Jumping ahead of
8 you here.

9 Commissioners, any questions? No questions
10 from the Commission.

11 MR. COX: At this time, FPL would move the
12 exhibits that were attached to his testimony in
13 Exhibit A, which are marked as hearing Exhibits No.
14 3 through 7 into the record.

15 CHAIRMAN CLARK: Any objections? So ordered.

16 (Whereupon, Exhibit Nos. 3-7 were received
17 into evidence.)

18 MR. COX: Thank you.

19 CHAIRMAN CLARK: Is the witness excused?

20 MR. COX: May the witness be excused?

21 CHAIRMAN CLARK: Yes, the witness is excused.

22 MR. COX: Thank you.

23 (Witness excused.)

24 CHAIRMAN CLARK: We are going to take a
25 two-minute recess and give Mr. Staden a chance to

1 work on the microphone here.

2 (Discussion off the record.)

3 CHAIRMAN CLARK: All right. I severely
4 underestimated Mr. Staden's abilities to get things
5 done fast over there, didn't I?

6 All right. Mr. Wright, your witness.

7 MR. SCHEF WRIGHT: Thank you, Commissioner
8 Clark. The Environmental Defense Fund calls David
9 Cranston to the stand.

10 Whereupon,

11 DAVID CRANSTON

12 was called as a witness, having been previously duly
13 sworn to speak the truth, the whole truth, and nothing
14 but the truth, was examined and testified as follows:

15 EXAMINATION

16 BY MR. SCHEF WRIGHT:

17 Q Good morning, Mr. Cranston.

18 A Good morning, Mr. Wright.

19 Q You have taken the oath to tell the truth in
20 your testimony, correct?

21 A Yes, I have.

22 Q Thank you.

23 Did you prepare and cause to be filed in this
24 case on March 24th, 2026, prefiled direct testimony
25 consisting of 35 pages?

1 A Yes, I did.

2 Q Do you have any changes or corrections to that
3 testimony?

4 A No, I do not.

5 Q And if I were to ask you these same questions
6 today, would your answers be the same?

7 A Yes, they would.

8 Q And do you adopt this testimony as your sworn
9 testimony to the Florida Public Service Commission in
10 this proceeding today?

11 A Yes. I do.

12 MR. SCHEF WRIGHT: Mr. Chairman, I request
13 that Mr. Cranston's testimony be entered into the
14 record as though read.

15 CHAIRMAN CLARK: So ordered.

16 MR. SCHEF WRIGHT: Thank you.

17 (Whereupon, prefiled direct testimony of David
18 Cranston was inserted.)

19

20

21

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**IN RE: PETITION FOR DETERMINATION OF NEED FOR ANDYTOWN-OASIS
TRANSMISSION LINES PROJECT IN BROWARD AND MIAMI-DADE
COUNTIES, BY FLORIDA POWER & LIGHT COMPANY,
DOCKET NO. 20260020-EI**

**DIRECT TESTIMONY OF DAVID CRANSTON
ON BEHALF OF ENVIRONMENTAL DEFENSE FUND, INC.**

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12

INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is David Cranston, and my business address is 136 4th
Street N, Suite 317, St. Petersburg, Florida 33701.

Q. On whose behalf are you testifying in this proceeding?

A. I am testifying on behalf of the Environmental Defense Fund, Inc.,
commonly known as EDF, an international not for profit organization
that advocates for pragmatic solutions to environmental issues in all
sectors of the world economy, including energy and electricity, based
on sound science, economics, law, and public policy.

1 **Q. Please summarize your educational background and professional**
2 **experience with respect to the issues in this transmission line need**
3 **determination proceeding.**

4 A. I earned a Bachelor of Arts degree in Political Science from the
5 University of Connecticut in 2011 and a Master's degree in Public
6 Affairs from the University of Texas at Austin's Lyndon B. Johnson
7 School of Public Affairs in 2014. Since February 2024 I have served as
8 the Florida Energy Policy Manager for EDF, where I engage on a broad
9 range of topics pertaining to the energy and electric power sectors in
10 Florida through research, data analysis, written reports, and
11 stakeholder engagement forums. This includes my current
12 participation in the stakeholder process hosted by the Florida
13 Reliability Coordinating Council (FRCC) to update the regional
14 transmission planning framework for Florida utilities in alignment with
15 the Federal Energy Regulatory Commission's (FERC) Order No. 1920.
16 Previously, I served as a Conservation Program Associate and then as
17 a Business Process Specialist at Austin Energy, which is the municipal
18 electric utility that serves the city of Austin, TX and surrounding areas.
19 With more than 550,000 customers, Austin Energy is one of the largest

1 municipal utilities in the United States. My role was based in the
2 Customer Renewable Solutions division where I helped develop and
3 deliver programs for all customers who adopted distributed energy
4 resources (DERs), and where I led an effort to update the utility's DER
5 interconnection policies.

6

7 **Q. Have you previously testified in proceedings before utility regulatory**
8 **authorities? If so, please briefly describe your prior testimony and**
9 **presentations before regulatory authorities.**

10 A. No, I have not.

11

12 **Q. Are you testifying as an expert in this proceeding? If so, please state**
13 **the area or areas of your expertise relevant to your testimony.**

14 A. Yes, I am testifying as an expert on appropriate principles and
15 considerations to be followed by public utilities and public utility
16 regulatory authorities in making planning and investment decisions for
17 transmission and related utility power supply assets.

18

19 **Q. Are you sponsoring any exhibits in this case?**

- 1 A. Yes, I am sponsoring the following exhibits:
- 2 Exhibit DC-1 Résumé of David Cranston;
- 3 Exhibit DC-2 Assessment of Florida’s Electric Transmission
4 System Performance and Opportunities for
5 Enhancement (2026);
- 6 Exhibit DC-3 FERC Order No. 1000;
- 7 Exhibit DC-4 FERC Order 1920;
- 8 Exhibit DC-5 FERC Orders 1920-A;
- 9 Exhibit DC-6 FERC Orders 1920-B;
- 10 Exhibit DC-7 EDF Comments to FRCC 1920 Tariff Language;
- 11 Exhibit DC-8 EDF Comments to FRCC Order 1920 Tariff
12 Language;
- 13 Exhibit DC-9 EQ Research EDF Florida Fuel Cost Report;
- 14 Exhibit DC-10 Rao Konidena Testimony in Indiana Ameren CPCN
15 Case;
- 16 Exhibit DC-11 The Untapped Grid (March 2026); and
- 17 Exhibit DC-12 Unlocking the Queue with GETs (Feb 2021).
- 18
- 19

1 **PURPOSE AND SUMMARY OF TESTIMONY**

2 **Q. What is the purpose of your testimony?**

3 A. As EDF's Florida Energy Policy Manager, I focus on research, analysis,
4 and industry discussions on the latest developments in energy policy,
5 technology, and markets in Florida and at the national level. This
6 provides me with a broad foundation of knowledge on the current
7 operation and performance of Florida's electric power sector, and
8 with deep perspective on opportunities to improve the affordability,
9 reliability, and security of Florida's power supply through responsible
10 policy. My work spans Florida's energy resource mix, demand-side
11 management solutions, and power grid modernization. With respect
12 to grid modernization, I have adopted a special focus on power
13 generation and transmission planning in the context of the regional
14 transmission planning requirements of the FERC. As part of this subject
15 matter focus, I managed a study of Florida's electric transmission
16 system in partnership with an engineering team at the University of
17 Florida (UF). I also co-authored the report on our findings.

18 In addition, since September 2025 I have been engaged on EDF's
19 behalf as a stakeholder in the effort to incorporate the principles and

1 requirements of Order No. 1920 into the regional transmission
2 planning process of Florida’s electric utilities. As part of this process, I
3 have collaborated with other expert stakeholders to discuss directly
4 with utility transmission planners their proposed reforms to the
5 existing regional planning process, and co-authored and submitted
6 multiple rounds of comments on those proposals.

7 Consistent with my role with EDF, my testimony addresses what
8 I believe are systemic defects in the planning processes that FPL claims
9 support its Andytown-Oasis Transmission Lines Project (the
10 “Andytown-Oasis Project” or the “Project”). My testimony includes
11 extensive discussion of measures that FPL should have included in its
12 planning processes to produce results that are better for its
13 customers, better for Florida as a whole, and consistent with the
14 requirements of federal regulations.

15 Finally, my testimony describes EDF’s organizational mission –
16 accelerating a clean and economically sustainable energy transition –
17 and EDF’s Florida membership.

18

1 **Q. Please summarize your opinions regarding FPL's proposed**
2 **Andytown-Oasis Transmission Lines Project.**

3 A. FPL conducts transmission planning in conjunction with FRCC. Both
4 FPL's and the FRCC's planning activities fail to provide transmission
5 planning and investment decisions that serve the public interest.
6 Accordingly, I recommend that the Florida Public Service Commission
7 deny FPL's petition for the Project and direct FPL to consider the
8 regional needs that were identified by the FRCC through the last
9 regional Biennial Transmission Planning Process, and where those
10 previous studies do not appropriately reflect regional needs, to
11 conduct legitimate and robust regional transmission planning studies
12 that are consistent with the requirements of the FERC's orders to
13 determine which regional needs could be jointly served by a
14 transmission solution. The Commission should also require that FPL
15 evaluate alternative solutions to the identified needs, not merely
16 changes to routing. These alternatives should include the potential
17 role of Advanced Transmission Technologies (ATTs) and Grid
18 Enhancing Technologies (GETs) including but not limited to Dynamic
19 Line Rating, Advanced Power Flow Controllers, Reconductoring,

1 Topology Optimization, and Battery Energy Storage Systems, to cost-
2 effectively meet the needs that the Andytown-Oasis Transmission
3 Lines Project is designed to address, as well as potential future
4 regional needs. The Commission should further require that FPL
5 engage all stakeholders in a timely way in those planning studies, with
6 stakeholders having full access to FPL's modeling in a reasonable time
7 frame.

8

9

FLORIDA'S TRANSMISSION CHALLENGES

10 **Q. As part of your work at EDF you undertook an evaluation of the**
11 **Florida transmission system. Please describe that work.**

12 A. EDF engaged an engineering team at the University of Florida to
13 conduct a comprehensive study of Florida's transmission system . The
14 study began in spring 2025 and was completed at the end of the year.

15 It uses 2024 data on transmission assets and 2023 data on electricity
16 usage. The transmission lines studied range from 69 kilovolts (kV) to
17 500 kV.

18 Florida's power grid is changing. Historically, its electricity
19 supply has primarily come from coal plants. Over the last several

1 decades, natural gas has taken coal's place and now provides about
2 three-quarters of the state's electricity. These thermal plants are
3 typically hundreds or thousands of megawatts (MW) in size. Florida's
4 energy resource mix is continuing to change as utility-scale solar
5 facilities have started to receive much more investment relative to
6 thermal plants. In their most recent Ten-Year Site Plans published in
7 2025, the state's three largest electric utilities (Florida Power & Light,
8 Duke Energy Florida, and Tampa Electric Company) plan to build more
9 than 23 GW of new solar facilities through 2034. This will create a
10 significant shift in the energy resource mix, as solar energy is projected
11 to rise from 7% to 28% while natural gas is projected to fall to 56% of
12 the state's electricity generation. In addition, the solar facilities being
13 built in Florida are smaller and more geographically dispersed than the
14 state's thermal plants. The typical solar generation facility in Florida is
15 just under 75 MW to qualify for exemption under the Power Plant
16 Siting Act. More solar capacity is emerging in rural northern Florida, to
17 complement expanding solar capacity in the central and southwest
18 parts of the state, so in coming years we expect to see increased power

1 flows from rural areas to load centers, especially in summer peak
2 hours.

3 Florida is also seeing new electricity demand. While population
4 growth continues, increased loads from transportation electrification
5 and large load customers such as artificial intelligence (AI) data centers
6 are projected to drive demand higher. Electricity consumption in
7 Florida increased by 8% from 2015-2024; it is projected to increase
8 another 11% by 2034. On top of this, the resilience of Florida's grid to
9 system shocks is under increasing pressure from extreme weather
10 events, such as hurricanes.

11 This structural shift to a more dynamic generation mix and new
12 load sources, plus the impact of increasingly extreme weather, adds to
13 the operational challenges that Florida's utilities face in managing a
14 reliable transmission system. As I will describe below, it creates or
15 amplifies transmission reliability needs throughout the state, as well
16 as opportunities for more economic operation of the power grid.

17 The UF team constructed a model of Florida's transmission
18 system using publicly available data. The model includes all
19 transmission lines that span two or more counties, including line type,

1 voltage level, and associated substations. The model also includes
2 county-level load and generation information. The UF team then
3 applied a production cost model with power flow component to
4 analyze how much each line is utilized and the system-level production
5 cost across a range of scenarios. These include the base case (i.e.,
6 without contingencies), loss of a transmission line, loss of one or more
7 generation resources, loss of both generation and transmission
8 resources, and the addition of a single new large load customer. The
9 UF team tested these scenarios during average load conditions and
10 during both summer and winter peak hours. In addition to testing
11 these scenarios with current generation and transmission assets, the
12 UF team also tested them under a “2035 outlook” after adding in all
13 new generation and inter-county transmission assets that are
14 projected to come online by 2035 per the latest Ten-Year Site Plans.
15 The purpose of this analysis was to identify vulnerabilities, reliability
16 needs, and operational bottlenecks across the system. To my
17 knowledge, this is the first such statewide assessment of the Florida
18 transmission system.

1 We identified a pattern of transmission reliability needs that
2 appear from north to west central to south Florida. Reliability
3 constraints are amplified in the 2035 outlook compared to today, with
4 more transmission lines reaching full loading or exceeding 80% of their
5 limit during the base case and during most contingency events. Lines
6 in southwest and southeast Florida experience the highest share of
7 reliability constraints (i.e., high or full line loading) relative to the
8 number of connections that exist in these areas. With respect to
9 economic constraints, we found that contingencies that occur in south
10 Florida (such as transmission line and generator outages) tend to drive
11 the largest increases in system-wide production cost.

12 The UF team also evaluated three different types of
13 transmission solutions to quantify their effects on congestion,
14 production cost, and overall system reliability. Specifically, they
15 studied the impacts of building a new greenfield transmission line,
16 expanding capacity on an existing transmission line, and applying
17 Dynamic Line Rating to an existing transmission line. We found
18 opportunities to attain significant production cost savings and net
19 economic benefit to ratepayers through implementation of these

1 solutions, especially through new regional transmission projects and
2 especially where south Florida transmission assets are involved.

3

4

FLORIDA'S FLAWED PLANNING PARADIGM

5 **Q. Please summarize the regulatory framework applicable to**
6 **transmission planning.**

7 A. FERC has overall regulatory responsibility for regulation of the electric
8 transmission system, including transmission planning, pursuant to the
9 Federal Power Act. Through numerous orders, FERC requires that
10 utilities participate in regional planning and has established principles
11 and considerations applicable to utility transmission planning.

12

13 **Q. What is your understanding of the function of FERC Order No. 1000**
14 **and Order No. 1920 and the obligations that utilities have under**
15 **those Orders?**

16 A. Those are FERC's regional planning orders and they require that
17 utilities participate in regional planning. While FERC found in
18 promulgating Order No. 1920, that the existing regional planning
19 processes under Order No. 1000 were unjust and unreasonable, it

1 nevertheless found that the additional long term planning under
2 Order No. 1920 established a just and reasonable replacement. So
3 what this means for utilities like FPL is that they must engage in
4 planning with their regional grid planner – in this case the Florida
5 Reliability Coordinating Council, alongside the other Florida utilities –
6 and look at the system needs state wide, and find solutions that
7 address these system-wide needs. Under Order No. 1000 these
8 processes can be limited to region-widereliability violations. Under
9 Order No. 1920, they must look at both reliability and economic
10 system needs. And crucially under Order No. 1920, the forecast for the
11 needs looks 20 years out into the future so that these decades long
12 assets can be planned for what comes up at these later junctures.

13

14 **Q. Please describe the historical framework of FPL’s regional planning**
15 **obligations under FERC Order 1000.**

16 A. Issued in 2011, FERC Order No. 1000 was originally designed to
17 encourage robust, cost-effective regional transmission planning. To
18 spur competition and lower costs for ratepayers, the order eliminated
19 the federal Right of First Refusal (ROFR) for regionally planned

1 projects. The goal was to open the door for independent transmission
2 developers to compete to build the most efficient regional lines.

3

4 **Q. Did FERC Order 1000 successfully produce robust regional**
5 **transmission development in Florida?**

6 A. No, it resulted in a widely recognized, unintended consequence known
7 in the industry as the "local loophole." Because incumbent utilities lost
8 their monopoly rights to build regional lines, they drastically shifted
9 their capital investments toward local transmission projects. Local
10 projects retained the Right of First Refusal (ROFR), allowed utilities to
11 avoid competitive bidding, and historically faced far less regulatory
12 scrutiny. Rather than holistic regional development, this loophole
13 incentivized the kind of piecemeal, inefficient grid expansion we are
14 seeing with FPL's localized proposals today.

15

16 **Q. How has the Federal Energy Regulatory Commission addressed the**
17 **failure of Order 1000 to produce efficient regional buildouts?**

18 A. In May 2024, FERC issued Order No. 1920. Recognizing the systemic
19 failure of the previous framework, FERC designed Order No. 1920 to

1 force transmission providers to take a broader, more forward-looking
2 view of grid reliability and to explicitly rein in the industry's over-
3 reliance on inefficient local projects.

4

5 **Q. What specific mandates does FERC Order No. 1920 place on utilities**
6 **and entities like the FRCC to correct these inefficiencies in their**
7 **transmission planning activities?**

8 A. Order 1920 contains three critical mandates designed to ensure that
9 ratepayers are not funding sub-optimal, fragmented grid expansions.
10 First, it requires transmission providers to develop comprehensive, 20-
11 year regional planning scenarios that proactively account for long-
12 term load growth and shifting generation resources, rather than
13 reacting to short-term, localized bottlenecks. Second, it specifically
14 requires transmission providers to evaluate whether local
15 transmission projects can be "right-sized"—meaning expanded or
16 modified in scale—to address broader regional needs. This ensures
17 that a single, slightly larger line is built to solve regional constraints
18 more cost-effectively than building multiple smaller, siloed local lines
19 over time. Third, it explicitly mandates the evaluation of Advanced

1 Transmission Technologies (“ATTs”), sometimes called Grid-Enhancing
2 Technologies (“GETs”)—such as dynamic line ratings and advanced
3 power flow controls. Planners must prove they have attempted to
4 maximize the capacity of the existing grid using these advanced
5 technologies before defaulting to expensive new conventional line
6 construction.

7

8 **Q. Has EDF attempted to participate in the FRCC processes? If so, why**
9 **is EDF not satisfied with the FRCC processes?**

10 A. Yes. EDF representatives have raised these issues to the FRCC, but
11 thus far, they have not been incorporated into the FRCC’s planning
12 analyses. See, for example, my Exhibits DC-7 and DC-8, which are
13 comments provided by EDF to the FRCC regarding tariff language in
14 relation to Order No. 1920. EDF is not satisfied with the results of
15 FRCC’s processes for the several reasons discussed in my testimony.

16

17

18 **Q. What are ATTs and GETs?**

1 A. ATTs or GETs are hardware and software options that increase the
2 capacity, efficiency, and/or reliability of the existing transmission grid.
3 They are quick-deployment, cost-effective tools that maximize the
4 capabilities of the infrastructure we already have, rather than strictly
5 relying on building expensive new transmission lines. The four most
6 commonly deployed GETs today are Dynamic Line Ratings (DLR),
7 Advanced Power Flow Controllers, Advanced or “High Performance”
8 Conductors (also called “reconductoring” when used to upgrade an
9 existing transmission line), and Topology Optimization.

10

11 **Q. How do these federal obligations relate to FPL’s current application**
12 **before the Florida Public Service Commission?**

13 A. FPL’s application exemplifies the exact “local loophole” behavior that
14 FERC Order 1920 was designed to eliminate. By bringing forward a
15 localized project without demonstrating a rigorous evaluation of right-
16 sizing opportunities or ATTs. FPL is operating under an outdated
17 planning paradigm. It is circumventing its obligation to participate in a
18 modern, cost-effective regional planning process, ultimately passing
19 the cost of that inefficiency onto Florida ratepayers.

1

2 **Q. After reviewing FPL’s petition and supporting materials, do you**
3 **believe that FPL’s planning process will result in solutions that deliver**
4 **low-cost electrical energy that will assure the economic well-being**
5 **of Florida residents and businesses?**

6 A. No, I do not. In fact, it is structurally impossible for FPL to determine a
7 low-cost solution—as affirmatively required by the Transmission Line
8 Siting Act (“TLSA”)—under its current planning paradigm. FPL has
9 described a planning process that is explicitly limited to addressing
10 localized reliability violations under standards published by the North
11 American Electric Reliability Corporation (“NERC”). While meeting
12 NERC reliability standards is a mandatory baseline, treating a
13 minimum compliance standard as a comprehensive grid strategy
14 ensures that systemic economic efficiencies are completely ignored.

15

16 **Q. How does this narrow focus on NERC violations specifically manifest**
17 **in the proposed Andytown-Oasis Project?**

18 A. FPL’s proposed Andytown-Oasis Project exemplifies a fundamentally
19 flawed, siloed approach to transmission planning. By deliberately

1 limiting its scope to a single NERC violation and ignoring broader, well-
2 documented system constraints, FPL has engineered a sub-optimized,
3 piecemeal solution.

4

5 **Q. In contrast to FPL's approach, what would a prudent utility planning**
6 **process entail?**

7 A. A prudent utility planning process would evaluate whether "right-
8 sizing" this corridor could simultaneously resolve adjacent regional
9 constraints. By looking at the overlapping needs of the broader
10 system, a utility can capture critical economies of scale—building one
11 high-capacity, highly efficient corridor instead of multiple fragmented
12 ones. Instead, FPL's narrowly tailored design solves a single, localized
13 issue while leaving obvious, overlapping system needs completely
14 unaddressed.

15

16 **Q. What are the long-term consequences for Florida ratepayers if the**
17 **Commission approves this fragmented approach?**

18 A. This artificially fragmented approach guarantees future grid
19 congestion. Because FPL is deliberately leaving adjacent constraints

1 unresolved, it is virtually ensuring that its ratepayers will be forced to
2 fund additional, redundant infrastructure in the coming years.
3 Ratepayers will be forced to pay twice for what a properly right-sized
4 project could have accomplished once.

5

6 **Q. Are there system-wide needs that FPL did not consider?**

7 A. Yes. The University of Florida study was completed on behalf of EDF
8 and found that there were several areas where there were constraints
9 that the development of transmission could help resolve.

10 These include constrained lines in south Florida. For example,
11 that exceed 80% of their limit the Palm Beach to Miami-Dade line
12 operates above 80% of its limit during summer and winter peak hours,
13 and the Hendry to Palm Beach line operates at its full limit during
14 average load and summer peak hours, a. In 2035 these two lines are
15 projected to be constrained under all load conditions.

16

17 **Q. Based on your review of FPL's historical and current transmission**
18 **planning, do you have reason to believe that its planning process is**

1 **consistent with the long-term economic interests of Florida**
2 **ratepayers?**

3 A. No, I do not. FPL's transmission planning demonstrates a clear,
4 recurring pattern of designing localized, fragmented projects that
5 solve immediate objectives while deliberately ignoring broader, long-
6 term statewide needs. This narrowly tailored approach consistently
7 fails to capture critical economies of scale, ultimately forcing
8 ratepayers to absorb the costs of an inefficient and sub-optimized grid.

9

10 **Q. Can you provide a historical example of this flawed planning**
11 **approach on the FPL system?**

12 A. Yes. A prime example is the North Florida Resiliency Connection
13 (NFRC), a transmission project FPL constructed to physically
14 interconnect its legacy peninsular system with its newly acquired Gulf
15 Power territory in the Panhandle. Despite the massive geographic and
16 operational scale of integrating these two major electric systems, FPL
17 chose to construct this critical interconnection as a relatively low-
18 capacity 161 kV line.

19

1 **Q. Why is constructing the NFRC at 161 kV indicative of planning that**
2 **harms ratepayers?**

3 A. From a long-term engineering and economic perspective, the NFRC
4 was drastically underbuilt. Connecting two massive regional grids
5 should have been an opportunity to construct a robust, high-voltage
6 (e.g., 345 kV or 500 kV) corridor capable of moving vast amounts of
7 low-cost generation across the state. However, under the Florida
8 Transmission Line Siting Act, constructing a line at 230 kV or above
9 generally triggers a mandatory, highly scrutinized Need Determination
10 proceeding before this Commission. By artificially constraining the
11 NFRC design to 161 kV, FPL kept the project just below the statutory
12 threshold for regulatory review, thereby circumventing a rigorous
13 public evaluation of cost-effective alternatives and long-term
14 statewide benefits.

15
16 **Q. What is the ultimate impact on Florida consumers when FPL**
17 **underbuilds a line like the NFRC?**

18 A. It locks ratepayers into a cycle of redundant spending. Because the 161
19 kV NFRC line was underbuilt relative to the true, long-term capacity

1 needs between the Panhandle and the Peninsula, the corridor will
2 inevitably experience severe congestion as power demands grow and
3 more generation is integrated. FPL will eventually have to build
4 additional, parallel infrastructure to solve the capacity constraints that
5 a single, "right-sized" high-voltage line would have solved from the
6 beginning. Ratepayers pay the "piecemeal penalty" of funding
7 multiple inefficient projects instead of one optimal project.

8

9 **Q. How does FPL's installation of the NFRC project relate to the**
10 **Andytown-Oasis Project currently before the Commission?**

11 A. It establishes that FPL's localized planning methodology—designing
12 projects in a vacuum to avoid broader regional solutions—is not an
13 anomaly; it is a standard operating procedure. Just as FPL artificially
14 constrained the NFRC to bypass rigorous alternatives assessment, it is
15 now presenting the Andytown-Oasis Project as a narrow, localized fix
16 while deliberately ignoring the broader system constraints identified
17 in regional planning studies. In both cases, FPL's planning process
18 prioritizes the utility's immediate corporate convenience over the

1 statutory mandate to deliver abundant, low-cost energy through the
2 most cost-effective, right-sized infrastructure.

3

4 **FPL'S FAILURE TO THOROUGHLY EVALUATE APPROPRIATE ALTERNATIVES**

5 **Q. Did FPL conduct a robust and thorough evaluation of alternatives to**
6 **the proposed Andytown-Oasis Project?**

7 A. No, it did not. In its application, FPL claims to have evaluated two
8 alternatives to the proposed line: the Conservation-Oasis Project and
9 the Andytown-Oasis Two Circuits Project. However, these are not
10 fundamental engineering or economic alternatives. They are merely
11 alternative *routes* and configurations for the exact same localized,
12 traditional infrastructure project.

13

14 **Q. Do you believe that these alternatives are adequate to determine**
15 **whether the Project will result in low-cost electric energy to assure**
16 **the economic well-being of the residents" of Florida?**

17 A. I do not. FPL did not adequately consider alternative solutions, merely
18 alternative routes.

19

1 **Q. Why is the distinction between an "alternative route" and an**
2 **"alternative solution" important in this proceeding?**

3 A. Because evaluating different geographic routes for the same
4 expensive infrastructure does not answer the fundamental economic
5 question. The TLSA requires the Commission to consider the need for
6 "abundant, low-cost electrical energy to assure the economic well-
7 being of the residents of this state." To satisfy that standard, a utility
8 cannot just compare two different paths for putting new steel in the
9 ground. A prudent utility must evaluate entirely different *classes* of
10 solutions to ensure ratepayer funds are being deployed as efficiently
11 as possible. FPL completely failed to do this.

12

13 **Q. What specific alternative solutions did FPL fail to evaluate in its**
14 **application?**

15 A. While FPL is quick to detail the catastrophic impacts it claims will occur
16 if the line is not built, its alternatives assessment presents a false
17 choice between building this exact line or doing nothing. There is zero
18 rigorous, quantitative discussion of building a more expansive, right-
19 sized regional project to capture economies of scale. Even more

1 egregiously, there is no evaluation of ATTs or GETs—such as dynamic
2 line ratings or advanced power flow controls—as potential solutions
3 to the NERC violations identified, either on their own or as part of a
4 portfolio.

5

6 **Q. Please explain how Dynamic Line Ratings (DLR) could potentially**
7 **resolve localized capacity constraints.**

8 A. Utilities historically use static or seasonal line ratings, which are based
9 on highly conservative weather assumptions and leave significant
10 excess, unused capacity on the transmission line during most hours of
11 the year. However, Dynamic Line Ratings utilize non-contact sensors
12 to monitor real-time weather conditions—such as wind speed,
13 sunlight, and conductor temperature—to maximize available capacity.
14 Because wind cools the conductor, real-time monitoring can safely
15 increase the transmission capacity of an existing line by up to 44%.
16 Deploying DLR sensors is incredibly cost-effective, estimated at
17 roughly \$22,727 per mile, compared to the millions of dollars per mile
18 required for new transmission construction. This is consistent with the
19 assessment of energy consultant Rao Konidena of Rakon Energy from

1 his testimony on behalf of EDF and the Citizens Utility Board in Ameren
2 Transmission Company's 2024 Joint Petition for a Certificate of Public
3 Convenience and Necessity (Exhibit DC-10.

4

5 **Q. How do Advanced Power Flow Controllers and Topology
6 Optimization address grid congestion?**

7 A. Advanced Power Flow Controllers are hardware devices that change
8 the reactance on a constrained transmission line, effectively "pushing"
9 excess power away from the congested line and onto neighboring,
10 unconstrained lines. Topology Optimization is a software-based
11 solution—often described as the "Waze for the transmission grid"—
12 that identifies real-time system reconfigurations, such as opening and
13 closing circuit breakers, to route power around congested areas. Both
14 technologies resolve localized bottlenecks by optimizing the flow of
15 power across the broader network, often eliminating the need for
16 localized infrastructure upgrades.

17

18 **Q. How does reconductoring with Advanced Conductors compare to
19 building a completely new transmission line?**

1 A. Reconductoring with advanced conductors involves replacing
2 traditional aluminum-core steel-reinforced (ACSR) wires on existing
3 transmission towers with conductors that have a different structure
4 and core. This process can increase the current-carrying capacity of an
5 existing corridor by up to 250%. Because reconductoring utilizes
6 existing towers and Right-of-Way, it avoids the massive costs of
7 acquiring new land and erecting new steel, often allowing capacity to
8 be doubled at half the price of building a new line.

9

10 **Q. Why should a prudent utility evaluate ATTs before proposing a new**
11 **capital-intensive transmission line like the Andytown-Oasis project?**

12 **A.** There are three primary reasons: Cost, speed of deployment, and
13 mitigation of land-use impacts. First, ATTs generally cost a fraction of
14 what a new transmission line costs. Second, ATTs can accelerate the
15 speed at which thermal constraints and reliability problems are
16 resolved. For example, procuring large power transformers for new
17 substations can take more than two years. In contrast, sensors for
18 Dynamic Line Ratings can be installed rapidly without even requiring a
19 transmission outage. Finally, ATTs do not require the acquisition of

1 new Right-of-Way (ROW) or land rights, which significantly minimizes
2 environmental disruptions and landowner impacts.

3

4 **Q. Why does FERC Order No. 1920 make FPL's failure to evaluate these**
5 **technologies at the local level problematic?**

6 A. FERC Order No. 1920 officially established that evaluating ATTs is no
7 longer experimental or optional: It is a mandatory component of
8 prudent, cost-effective transmission planning. While Order 1920
9 applies explicitly to regional planning, it sets a clear, undeniable
10 industry standard: A modern utility simply cannot accurately assess
11 the "need" for new infrastructure without first evaluating whether
12 advanced technology can unlock capacity on existing rights-of-way.

13

14 **Q. What is the regulatory consequence of FPL failing to evaluate GETs?**

15 A. Under the Florida Transmission Line Siting Act (TLSA), FPL bears the
16 absolute burden of proving that the Andytown-Oasis Project is needed
17 to ensure system reliability and to deliver abundant, low-cost
18 electrical energy to assure the economic well-being of the residents of
19 the state, and by extension, of all Floridians. By completely failing to

1 evaluate whether rapid, low-cost GETs could resolve the identified
2 constraints on existing rights-of-way, FPL has rendered its alternatives
3 assessment fundamentally flawed and incomplete. Without this
4 analysis, it is impossible for the Commission to conclude that FPL's
5 proposed capital-intensive project is genuinely the "least-cost means"
6 of satisfying the needs of Florida ratepayers.

7
8
9 **EDF'S FLORIDA MEMBERSHIP AND ENERGY POLICY MISSION**

10 **Q. Please describe EDF's membership in the State of Florida.**

11 **A.** EDF is a national non-profit environmental advocacy organization
12 with a substantial and active membership base in Florida. As of
13 March 23, 2026, EDF has approximately 17,000 members residing in
14 the state who support our mission to protect human health and the
15 environment.

16 **Q. Of those Florida members, how many are customers of Florida
17 Power & Light?**

18 **A.** Based on a review of our membership data and utility service
19 territories, EDF has approximately 8,900 members who are

1 residential or commercial retail ratepayers of FPL. These members
2 have a direct, substantial financial interest in the outcome of this
3 proceeding, as they will be required to fund the costs of the
4 proposed Andytown-Oasis Transmission Lines Project through their
5 utility bills.

6

7 **Q. Please describe EDF's organizational mission and activities as they**
8 **relate to energy policy.**

9 A. EDF's organizational interest is deeply rooted in advancing a clean,
10 affordable, and reliable energy transition. As stated explicitly in EDF's
11 public foundational documents and Energy Transition platforms,
12 "We're working with partners around the world, and across the
13 public and private sectors, to use the power of markets and
14 technology to drive down pollution quickly and affordably—and to
15 shift the world to clean energy as fast as possible."

16 In furtherance of its policy goals and purposes, EDF routinely
17 intervenes in administrative and regulatory dockets before key public
18 utility and energy commissions, including FERC, as well as the state
19 commissions of states including California, Colorado, Illinois,

1 Louisiana, Massachusetts, New Jersey, New York, North Carolina,
2 Pennsylvania, and Texas. EDF's interventions focus on supporting
3 comprehensive grid modernization, promoting robust grid planning
4 for extreme weather resilience, and protecting ratepayers from the
5 stranded asset costs associated with the expansion of unnecessary
6 natural gas infrastructure.

7

8 **Q. How does EDF's advocacy for a clean energy transition intersect**
9 **with the economic and reliability issues under the Commission's**
10 **jurisdiction?**

11 A. EDF's advocacy directly ties the environmental goal of pollution
12 reduction to the economic goal of affordable utility rates through the
13 mechanism of grid modernization. When evaluating infrastructure,
14 these goals are inseparable.

15 **Q. Has EDF historically engaged in advocacy in Florida that connects**
16 **energy development choices to ratepayer costs?**

17 A. Yes, extensively. EDF's Florida advocacy specifically focuses on how
18 energy development impacts ratepayer economics. For example, last
19 year EDF commissioned an in-depth study analyzing the economic

1 impact of rising natural gas costs on Florida utility customers. That
2 study concluded that continued reliance on gas generation in the
3 state will result in a staggering \$21 billion increase in costs for Florida
4 ratepayers between 2025 and 2034. Protecting our members from
5 these types of massive, avoidable economic burdens is a core
6 function of our advocacy.

8 CONCLUSIONS AND RECOMMENDATIONS

9 **Q. Please summarize the main conclusions and recommendations of**
10 **your testimony.**

11 A. The processes by which FPL came to propose the Andytown-Oasis
12 Transmission Lines Project cannot legitimately be characterized as the
13 natural result or by-product of effective regional transmission
14 planning, nor does it demonstrate a rigorous evaluation of low-cost
15 solutions to meet the articulated need. FPL's alternative consideration
16 processes were localized consideration of routes, not meaningful
17 transmission system alternatives.

18 FPL's failures to thoroughly consider all available transmission
19 alternatives, including technologies as well as routes, will result in its

1 customers paying more than necessary for service, thereby frustrating
2 the Transmission Line Siting Act's requirement that new transmission
3 lines are to ensure the provision of abundant, low-cost electrical
4 energy for the economic well-being of all Floridians.

5

6 **Q. Does this conclude your direct testimony?**

7 A. Yes.

8

9

10

11

12

1 BY MR. SCHEF WRIGHT:

2 Q Did you also identify, assemble and cause to
3 be filed with your March 24th testimony 12 exhibits
4 identified in your testimony as Exhibit Nos. DC-1
5 through DC-12?

6 A Yes, I did.

7 MR. SCHEF WRIGHT: Commissioner Clark, I note
8 for the record that Mr. Cranston's exhibits have
9 been identified as Exhibits 8 through 19 in the
10 comprehensive exhibit list.

11 BY MR. SCHEF WRIGHT:

12 Q Mr. Cranston, have you prepared a summary for
13 the Commissioners?

14 A Yes, I have.

15 Q Please deliver it.

16 A Good morning, Commissioners. My name is David
17 Cranston, and I am the Florida Energy Policy Manager for
18 the Environmental Defense Fund, or EDF.

19 EDF has approximately 17,000 members residing
20 in Florida about 8,900 of whom are FPL ratepayers. I
21 analyze electric transmission planning policy and work
22 on initiatives to improve the efficiency, reliability
23 and affordability of transmission planning in Florida.
24 I reviewed Florida Power & Light's petition to construct
25 the Andytown-Oasis project, or the AOP, and find it

1 deficient.

2 First, FPL did not conduct a full evaluation
3 of alternatives. Alternatives 1 and 2 in its petition
4 are merely alternative routes for the same project
5 design, a set of new 500 and 230 kV lines in a specific
6 corridor in Miami-Dade and Broward Counties. FPL did
7 not complete a quantitative study of grid enhancing
8 technologies or alternative transmission technologies,
9 a/k/a GETs and ETTs, like dynamic line rating, advanced
10 power flow control and reconductoring with advanced
11 conductors like aluminum conductor composite core; nor
12 did it study non-wire alternatives like battery storage,
13 which can address line overloads and voltage drops like
14 those considered here.

15 These technologies increase capacity and
16 flexibility of existing transmission infrastructure and
17 can deploy cheaper and faster than new lines with
18 minimal landuse impact. The AOP is a huge capital
19 expenditure, a prudent utility would evaluate all
20 available alternatives comparing their costs and impacts
21 before concluding the AOP best uses ratepayers funds.
22 FPL did not do this, so they cannot prove the AOP meets
23 reliability needs at least cost.

24 Second, FPL did not consider whether a
25 regional transmission project could resolve needs in

1 Miami-Dade County and address regional needs elsewhere.
2 Though, more expensive up front than a localized
3 project, a single regional transmission project can
4 solve multiple transmission providers needs at once and
5 lower the overall cost of energy. By allowing more
6 power transfer over longer distance, it captures
7 critical economies of scale, providing long-term grid
8 reliability more cost-effectively than building multiple
9 local projects like the AOP. A project that solves a
10 one-off local need is not necessarily the least cost
11 solution.

12 Regional transmission planning is supposed to
13 run through if the Florida Reliability Coordinating
14 Council, but the current process has resulted in zero
15 regional projects. When needs arise, it falls to FPL to
16 coordinate with other utilities to see if there is a
17 regional alternative that resolves local violations and
18 adds transmission value elsewhere, but FPL did not
19 coordinate. It took a siloed planning approach to
20 choose a narrowly tailored but high cost local project
21 that meets only a short-term reliability need.

22 This piecemeal solution does not leave
23 headroom for future needs that will arise on its system
24 given its load growth projections, ensuring ratepayers
25 must pay for another piecemeal project to address those

1 needs later.

2 To be clear, regional needs do exist on
3 Florida's transmission system. I co-lead a study with
4 the University of Florida engineering team that is the
5 first independent statewide study of Florida's
6 transmission system. This means it models and optimizes
7 system operations at the statewide level, whereas, in
8 Florida's current transmission planning approach,
9 utilities optimize only within their own service
10 territories. And this identified the potential for
11 regional solutions to address needs, including
12 Miami-Dade County, more cost-effectively than local
13 projects can.

14 And in conclusion, FPL has not demonstrated
15 that the AOP is needed. It did not evaluate alternative
16 transmission improvements that could meet the
17 reliability need at less cost and effort, and it did not
18 prove the AOP is the best use of ratepayer funds to
19 ensure system reliability and deliver abundant low-cost
20 electrical energy. Therefore, I recommend the
21 Commission deny FPL's petition and require it to fully
22 evaluate the alternatives discussed here, as a matter of
23 prudence and to ensure a complete evidentiary record.

24 **Q Thank you, Mr. Cranston.**

25 MR. SCHEF WRIGHT: Since we've waived cross,

1 the opportunity for -- he is tendered for cross by
2 the Commissioners.

3 CHAIRMAN CLARK: Thank you.

4 Commissioners, any questions? Seeing none.

5 MR. SCHEF WRIGHT: Thank you.

6 Mr. Chairman, I would move Exhibits 8 through
7 19 as identified in CEL into the record.

8 CHAIRMAN CLARK: Without objection, so
9 ordered.

10 (Whereupon, Exhibit Nos. 8-19 were received
11 into evidence.)

12 MR. SCHEF WRIGHT: Thank you.

13 And with that, may Mr. Cranston be excused?

14 CHAIRMAN CLARK: You are excused, Mr.
15 Cranston.

16 MR. SCHEF WRIGHT: Thank you.

17 (Witness excused.)

18 CHAIRMAN CLARK: You may call your next
19 witness, Mr. Wright.

20 MR. SCHEF WRIGHT: Thank you.

21 The Environmental Defense Fund calls Ted
22 Thomas.

23 CHAIRMAN CLARK: Mr. Thomas, were you here
24 when I was swearing the witnesses in?

25 THE WITNESS: I was not, Mr. Chairman.

1 **this proceeding today?**

2 A Yes, I do.

3 MR. SCHEF WRIGHT: Mr. Chairman, I request
4 that Mr. Thomas' testimony be entered into the
5 record as though read.

6 CHAIRMAN CLARK: So ordered.

7 MR. SCHEF WRIGHT: Thank you.

8 (Whereupon, prefiled direct testimony of Ted
9 Thomas was inserted.)

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**IN RE: PETITION FOR DETERMINATION OF NEED FOR ANDYTOWN-OASIS
TRANSMISSION LINES PROJECT IN BROWARD AND MIAMI-DADE
COUNTIES, BY FLORIDA POWER & LIGHT COMPANY,
DOCKET NO. 20260020-EI**

**DIRECT TESTIMONY OF TED THOMAS
ON BEHALF OF ENVIRONMENTAL DEFENSE FUND, INC.**

1 **INTRODUCTION AND QUALIFICATIONS**

2 **Q. Please state your name and business address.**

3 A. My name is Ted Thomas, and my business address is 1910 Navarre
4 School Road, Unit 5001, Navarre, Florida 32566.

5

6 **Q. On whose behalf are you testifying in this proceeding?**

7 A. I am testifying on behalf of the Environmental Defense Fund, Inc.,
8 commonly known as EDF, an international not for profit organization
9 that advocates for pragmatic solutions to environmental issues in all
10 sectors of the world economy, including energy and electricity, based
11 on sound science, economics, law, and public policy.

12

1 **Q. Please summarize your educational background and professional**
2 **experience with respect to utility regulation.**

3 A. I earned a Bachelor of Arts degree with High Honors in Political Science
4 from the University of Arkansas in 1986 and a Juris Doctor from the
5 University of Arkansas School of Law in 1988. My experience in utility
6 regulation includes serving as an Administrative Law Judge at the
7 Arkansas Public Service Commission and serving as a Commissioner
8 and Chairman of the Arkansas PSC from 2015 until 2022. I am a past
9 member and past president of the Organization of MISO States, an
10 organization of states whose transmission systems are part of the
11 Midcontinent Independent System Operator (“MISO”), the electric
12 grid operator for the central United States. MISO ensures the reliable
13 operation of the transmission grid serving 15 states and the Canadian
14 province of Manitoba. During my tenure on the Arkansas PSC, I also
15 served as a member of the Committee on Electricity of the National
16 Association of Regulatory Utility Commissioners (“NARUC”). I also
17 previously served as a member of the Arkansas House of
18 Representatives, a budget director for Governor Mike Huckabee, and
19 a prosecutor.

1 Following my service on the Arkansas PSC, I founded and serve
2 as a principal of Energize Strategies, a consulting firm that specializes
3 in utility issues, including issues relating to the regulation of
4 transmission systems. Although I am not appearing as an attorney in
5 this proceeding, I am licensed to practice law in Arkansas, and I am
6 admitted to practice before the United States Supreme Court, the
7 United States Courts of Appeals for the District of Columbia and the
8 Eighth Circuit, and the United States District Court for the Eastern and
9 Western Districts of Arkansas.

10

11 **Q. Have you previously testified in proceedings before utility regulatory**
12 **authorities? If so, please briefly describe your prior testimony and**
13 **presentations before regulatory authorities.**

14 A. Yes, in January 2025 I testified before the Indiana Utility Regulatory
15 Commission in Cause No. 46183, in May 2025 before the Georgia
16 Public Service Commission in Dockets No. 56002 and 56003, and in
17 November 2025 before the Indiana Utility Regulatory Commission in
18 Cause No. 46301.

19

1 **Q. Are you testifying as an expert in this proceeding? If so, please state**
2 **the area or areas of your expertise relevant to your testimony.**

3 A. Yes, I am testifying as an expert on appropriate principles and
4 considerations to be followed by public utilities and public utility
5 regulatory authorities in making planning and investment decisions for
6 transmission and related utility power supply assets.

7
8 **Q. Are you sponsoring any exhibits in this case?**

9 A. Yes, I am sponsoring the following exhibits:

10 Exhibit TT-1 Résumé of Ted Thomas;

11 Exhibit TT-2 FERC Order No. 1000;

12 Exhibit TT-3 FERC Order 1920;

13 Exhibit TT-4 FERC Order 1920-A;

14 Exhibit TT-5 FERC Order 1920-B;

15 Exhibit TT-6 2025 Transmission Planning and Development
16 Report Card (Feb 2026);

17 Exhibit TT-7 DOE National Transmission Needs Study (Oct
18 2023);

19 Exhibit TT-8 National Transmission Planning Study – Chapter 1;

- 1 Exhibit TT-9 National Transmission Planning Study – Chapter 2;
2 Exhibit TT-10 National Transmission Planning Study – Chapter 3;
3 Exhibit TT-11 National Transmission Planning Study – Chapter 4;
4 Exhibit TT-12 National Transmission Planning Study – Chapter 5;
5 Exhibit TT-13 National Transmission Planning Study – Chapter 6;
6 Exhibit TT-14 National Transmission Planning Study – Executive
7 Summary; and
8 Exhibit TT-15 Delaying Transmission Increases Cost and Reduces
9 Benefits for Consumers (2025).

10

11

PURPOSE AND SUMMARY OF TESTIMONY

12

Q. What is the purpose of your testimony?

13

A. EDF engaged me to provide my professional opinions regarding whether FPL’s proposed Andytown-Oasis Transmission Lines Project, abbreviated in my testimony as the “Andytown-Oasis Project” or the “Project,” is consistent with sound transmission planning and public interest principles, including whether it is consistent with the requirements established by orders of the Federal Energy Regulatory Commission (“FERC”). The specific orders to which I will refer most

19

1 frequently are Order No. 1000 and three related orders, Order No.
2 1920, Order No. 1920-A, and Order No. 1920-B, which I will refer to
3 collectively as “Order No. 1920.”

4

5 **Q. Please summarize your opinions regarding FPL’s proposed**
6 **Andytown-Oasis Transmission Lines Project.**

7 A. FPL conducts transmission planning in conjunction with the Florida
8 Reliability Coordinating Council (“FRCC”). Both FPL’s and the FRCC’s
9 planning activities fail to reliably ensure and demonstrate that
10 transmission planning and investment decisions will serve the public
11 interest . Although their planning processes are nominally called
12 “regional,” they actually constitute localized planning that fails to
13 meet appropriate transmission planning criteria, including optimizing
14 reliability and optimizing the delivery of reliable, low-cost power to
15 utility customers in Florida. Accordingly, I recommend that the Florida
16 Public Service Commission direct FPL to conduct true regional
17 transmission planning analyses, with full and timely opportunities for
18 stakeholder involvement, consistent with the requirements of the
19 FERC Orders.

1 **BACKGROUND: FEDERAL AND STATE REGULATORY FRAMEWORK**
2 **FOR REGIONAL TRANSMISSION PLANNING**

3 **Q. Please summarize the regulatory framework applicable to**
4 **transmission planning.**

5 A. FERC has overall regulatory responsibility for transmission planning
6 and regulation pursuant to the Federal Power Act (16 U.S.C. §§ 791 *et*
7 *seq.*). Through numerous orders, FERC requires that utilities
8 participate in regional planning and has established principles and
9 considerations applicable to utility transmission planning. It is
10 important that states consider these principles when making
11 decisions.

12

13 **Q. What is your understanding of the function of FERC Order No. 1000**
14 **and Order No. 1920 and the obligations that utilities have under**
15 **those Orders?**

16 A. Those are FERC's regional planning orders, which require that utilities
17 subject to FERC's jurisdiction under the Federal Power Act participate
18 in regional transmission planning that meets certain specified
19 standards. Planning processes consistent with these standards were

1 initially required by Order No. 1000. Subsequently, in Order No.
2 1920, FERC found that existing regional planning processes were
3 unjust and unreasonable and established further requirements in
4 Order No. 1920 to direct development of just and reasonable
5 replacements. What this means for utilities like FPL is that they must
6 engage in planning with their regional grid planner – in this case the
7 Florida Reliability Coordinating Council, alongside the other Florida
8 utilities – look at the system needs statewide, and find solutions that
9 cost-effectively address these overall needs. Under Order No. 1000,
10 these processes could be limited to region-wide reliability violations.
11 Under Order No. 1920, they must look at both reliability and
12 economic system needs. And crucially, under Order No. 1920, the
13 forecast for the needs looks 20 years out into the future so that these
14 decades-long assets can be planned for what comes up at these later
15 junctures.

16

17 **ASSESSMENT OF FPL'S AND THE FRCC'S REGIONAL PLANNING PROCESS**

18 **Q. Please explain how the FRCC regional planning process is supposed**
19 **to operate.**

1 A. Following the issuance of FERC Order No. 1000, transmission
2 planning regions were required to establish formal processes to
3 identify and evaluate regional transmission alternatives that could
4 meet system needs more efficiently or cost-effectively than localized
5 utility projects. In Florida, the FRCC complies with this mandate
6 through its Biennial Transmission Planning Process (BTPP). During
7 this two-year cycle, the FRCC conducts a "Proactive Planning"
8 analysis. The stated goal is to determine if any proposed regional
9 project qualifies as a Cost Effective or Efficient Regional Transmission
10 Solution (CEERTS). If a CEERTS is identified, its costs would
11 theoretically be allocated regionally, saving individual ratepayers
12 from bearing the full burden of localized infrastructure.

13
14 **Q. Does this "Proactive Planning" analysis actually result in the
15 selection of cost-effective regional projects?**

16 A. No. The process is structurally captured by the very utilities it is
17 meant to oversee. Potential regional solutions are evaluated by the
18 FRCC's Regional Projects Subcommittee (RPS). The members of this
19 subcommittee are the transmission planners and engineers from

1 Florida's incumbent monopolies, including FPL. Consequently, when
2 a regional alternative is proposed that might replace or optimize a
3 localized project like the Andytown-Oasis Project, it is FPL and its
4 peer utilities that evaluate the proposal. Unsurprisingly, they
5 consistently conclude that their own siloed, utility-by-utility
6 transmission plans are already the optimal path forward. The
7 incumbent utilities are effectively allowed to grade their own
8 homework.

9

10 **Q. What has been the empirical result of this FRCC process since FERC**
11 **Order No. 1000 was implemented?**

12 A. The historical record is unequivocal. Since the inception of the Order
13 1000 regional planning framework over a decade ago, **exactly zero**
14 CEERTS have been selected, approved, or constructed by any utility
15 in Florida through the FRCC process. Every single biennial cycle, the
16 FRCC issues a summary report concluding that no CEERTS projects
17 were identified.

18

1 **Q. What does this "zero project" track record mean for the**
2 **Commission's evaluation of the Andytown-Oasis Project?**

3 A. It means this Commission cannot rely on the FRCC process as a proxy
4 for regional planning directed at identifying efficient or cost-effective
5 projects. A regional planning process that has yielded zero regional
6 projects in over a decade is a compliance exercise, not a functional
7 planning tool. Because the FRCC framework systematically fails to
8 advance regional efficiencies, it is incumbent upon the FPSC to
9 rigorously scrutinize FPL's application. By presenting the Andytown-
10 Oasis Project in isolation, without genuinely evaluating how right-
11 sizing the Project could resolve broader system constraints, identified
12 in independent studies like the National Transmission Planning Study
13 performed by the U.S. Department of Energy (Exhibits TT-8 through
14 TT-14 to my testimony), FPL is perpetuating a fragmented, piecemeal
15 transmission development process. This artificially inflates
16 infrastructure costs for ratepayers and fails the statutory mandate to
17 provide the most cost-effective alternative.

18

1 **Q. Does FPL's proposed localized solution for the Andytown-Oasis**
2 **Project align with the modern regulatory framework established by**
3 **FERC Order No. 1920?**

4 A. No, it fundamentally frustrates the core intent of that order. The
5 modern regulatory framework relies on local transmission needs
6 serving as the economic building blocks for highly efficient, right-
7 sized regional solutions. FERC Order No. 1920 is explicitly designed to
8 capture the profound economies of scale that occur when
9 neighboring utilities coordinate to solve multiple system constraints
10 with shared, high-capacity infrastructure. By rushing to authorize a
11 capital-intensive, strictly local solution to this single constraint, FPL is
12 actively circumventing the efficiencies that Order 1920 is designed to
13 achieve for ratepayers.

14
15 **Q. How does approving a localized project like the Andytown-Oasis**
16 **Project today circumvent and frustrate the FERC's purposes of**
17 **future regional planning under Order 1920?**

18 A. It results in what is essentially the preemptive starvation of the
19 regional planning process. Regional planning requires identified local

1 needs to justify the cost and scale of a broader regional project. If FPL
2 is permitted to solve all of its isolated, localized constraints
3 piecemeal today through applications like this one, it will enter
4 future regional planning cycles with no stated needs. This guarantees
5 that comprehensive, cost-sharing regional projects never materialize
6 because the foundational local needs have already been functionally
7 erased from the board.

8

9 **Q. Does the Florida Reliability Coordinating Council regional planning**
10 **process ensure that FPL's proposed Andytown-Oasis Project is the**
11 **most cost-effective alternative for ratepayers?**

12 A. No, it does not. FPL routinely points to its participation in the FRCC's
13 regional planning process as evidence that its localized transmission
14 plans have been vetted for regional efficiency. However, a structural
15 and historical analysis of how the FRCC implements its regional
16 planning mandate demonstrates that this process acts as a rubber
17 stamp for incumbent utilities' localized plans, rather than a genuine
18 mechanism for identifying cost-saving regional infrastructure.

19

1 **Q. What is the ultimate impact on ratepayers if FPL's approach is**
2 **approved?**

3 A. It artificially forecloses the opportunity for ratepayers to benefit from
4 the cost savings of regional planning, reducing FPL's obligations
5 under Order 1920 to a mere paper exercise—compliance in name
6 only. Ratepayers are left funding highly expensive, fragmented local
7 projects, while the utility avoids the scrutiny and shared costs of a
8 genuinely collaborative, right-sized regional grid.

9

10 **Q. How does a well-planned transmission grid directly impact the cost**
11 **of energy for Florida ratepayers?**

12 A. The transmission grid dictates the economics of the entire
13 generation fleet. The system is operated through what is known as
14 "security-constrained economic dispatch." This means the grid
15 operator dispatches the lowest-cost generation resource available to
16 serve load, without regard to who owns it or where the load is
17 located, provided the grid can reliably accommodate the flow of that
18 power. As load increases, the system looks for the next cheapest unit

1 to turn on. It is critical to understand that in this real-time dispatch
2 process, only the *variable* cost of generation is considered.

3

4 **Q. Why is the distinction between variable and fixed costs so**
5 **important when evaluating the Andytown-Oasis transmission**
6 **Project?**

7 A. This distinction is critical because renewable resources, like utility-
8 scale solar, have essentially zero variable costs. In a dispatch
9 determination, zero-variable-cost resources will always be the
10 absolute cheapest energy available. However, that cheap energy is
11 entirely useless if the transmission grid is too constrained to deliver it
12 to the load centers. When FPL proposes a narrowly tailored, localized
13 project like Andytown-Oasis that fails to maximize regional transfer
14 capacity, it physically limits the geographic reach of the grid. This
15 restricts the amount of zero-variable-cost solar that can compete in
16 the economic dispatch, forcing the system to rely on more expensive,
17 volatile fossil-fuel generation to meet demand.

18

19

1 **ELEMENTS OF OPTIMAL TRANSMISSION PLANNING**

2 **Q. From your perspective as a former public service commissioner,**
3 **what are the elements of optimal transmission planning that FPL**
4 **should have applied here?**

5 A. Optimal transmission planning requires the simultaneous
6 consideration of all benefit streams over a long planning horizon. The
7 baseline criterion for any project is compliance with NERC reliability
8 standards—but that is merely the floor. A prudent utility must
9 optimize that reliability mandate with other criteria, specifically the
10 energy savings generated by unlocking broader economic dispatch.
11 Optimal planning actively seeks opportunities where a transmission
12 corridor can be "right-sized" so that the expected generation savings
13 pay for all or part of the infrastructure costs. FPL's approach with the
14 Andytown-Oasis Project completely ignores this optimization,
15 focusing strictly on a localized reliability fix while leaving massive
16 economic benefits on the table.

17

18 **Q. How does the concept of risk mitigation apply to transmission**
19 **planning in a growing state like Florida?**

1 A. Transmission is a multi-decadal asset; its benefits compound over
2 time while its capital costs depreciate. In a state experiencing rapid
3 load growth and a transition toward renewable energy, the greatest
4 risk to ratepayers is not overbuilding transmission—it is
5 underbuilding it. Expanding transmission capacity serves as a cost-
6 free hedge against generation risk because it diversifies the portfolio
7 of accessible resources. By proposing a localized, fragmented project
8 instead of a robust, right-sized regional solution, FPL is exposing
9 ratepayers to the severe economic risk of future grid congestion and
10 the inevitable need to fund redundant, piecemeal upgrades a few
11 years down the line. This is consistent with the findings in a 2025
12 report by GridStrategies, “Delaying transmission increases costs and
13 reduces benefits for consumers,” which is included as Exhibit TT-15
14 to my testimony.

15
16 **Q. Does FPL’s own executive management recognize the systemic risks**
17 **of failing to develop robust regional transmission?**

18 A. Yes, they do. While FPL’s transmission planners are presenting the
19 Andytown-Oasis Project to this Commission as a narrow, localized

1 reliability fix, FPL's financial executives have painted a starkly
2 different picture of the grid's macro-level needs. During FPL's 2025
3 base rate case, the company's Vice President of Finance, Scott Bores,
4 explicitly testified regarding the severe transmission risks and
5 constraints facing southeast Florida.

6

7 **Q. What specific transmission vulnerabilities did FPL identify in that**
8 **testimony?**

9 A. Mr. Bores testified that Miami-Dade and Broward counties represent
10 nearly 40% of FPL's customers and almost half of its forecasted load.
11 Because there is limited land available to build new generation in this
12 South Florida load pocket, FPL is forced to rely heavily on generation
13 located outside the FPL southeast Florida service territory and
14 transmit it southward. Furthermore, Mr. Bores noted that because
15 Florida's only interregional ties are at the extreme north end of the
16 state, the peninsula has a uniquely high exposure to voltage issues,
17 system stability failures, system separation, and under-frequency
18 load shedding.

19

1 **Q. Did FPL's management explicitly link these vulnerabilities to a lack**
2 **of regional transmission options?**

3 A. Yes. In a highly revealing statement, Mr. Bores testified: "*FPL's ability*
4 *to supply power purchased from outside of Florida if there is a*
5 *significant need or disruption due to extreme weather events is more*
6 *constrained than utilities with more access to regional options.*" By
7 emphasizing the difficulty in securing power transfers from outside
8 the state, his statement underlines the importance of power
9 transfers within the state to address significant needs. He further
10 noted that this constraint also applies to their heavy reliance on a
11 limited number of natural gas pipelines, compounding the risk during
12 tropical weather events.

13 These vulnerabilities are identified and discussed at some
14 length in the National Transmission Needs Study published by the
15 U.S. Department of Energy in October 2023. This Study is included
16 here as Exhibit TT-7 to my testimony.

17

1 **Q. How do you, as a former regulator, reconcile Mr. Bores's**
2 **admissions with FPL's current application for the Andytown-Oasis**
3 **Project?**

4 A. I cannot reconcile them, because they are fundamentally
5 contradictory. FPL's executive management has clearly identified that
6 the primary threat to the Florida grid—and specifically to the South
7 Florida load center—is a lack of regional connectivity and
8 transmission import capacity. Yet, the application before the
9 Commission today is a fragmented, localized project that does not
10 meaningfully expand Florida's access to those necessary regional
11 options.

12
13 **Q. What are the regulatory consequences of this contradiction?**

14 A. FPL is engaging in disjointed, sub-optimal planning that results in
15 higher costs and other adverse consequences to its ratepayers. FPL is
16 using the severe risks of regional isolation to justify rate increases in
17 one docket, while simultaneously ignoring those exact regional
18 solutions in its transmission planning docket. If FPL's ability to supply
19 power during extreme weather is critically constrained by a lack of

1 options from outside the region—as their own VP of Finance
2 attests—then the prudent, cost-effective solution is to aggressively
3 pursue comprehensive, high-capacity regional transmission and
4 advanced grid-enhancing technologies to maximize north-to-south
5 flow. By settling for a localized project that leaves South Florida
6 functionally isolated from broader regional support, FPL is ignoring
7 its own diagnosed vulnerabilities at the ratepayer's expense.

8

9 **Q. If FPL were to argue that a localized need determination proceeding**
10 **before the Commission is an "inappropriate forum" to address**
11 **broader regional transmission solutions, how would you respond as**
12 **a former state public service commission chairman?**

13 A. I strongly disagree with that premise. They argue that "regional
14 planning belongs at the regional level," attempting to restrict the
15 state commission's focus to a single, isolated line. However, state
16 regulators are the ultimate guardians of the ratepayer's wallet. It is
17 the retail ratepayer who bears the financial burden of these
18 infrastructure investments. If a utility's localized proposal ignores a
19 more cost-effective regional alternative, it is squarely within the

1 jurisdiction—and indeed, it is the statutory duty—of the state
2 commission to scrutinize that failure. The state commission is not the
3 wrong forum; when regional planning processes fail, the state
4 commission is the *only* forum left to protect the consumer.

5

6 **Q. Why can the FPSC not simply rely on the existing regional**
7 **transmission planning process to ensure that it builds low-cost**
8 **transmission?**

9 A. The Commission cannot rely on the FRCC process because the
10 existing FRCC regional planning framework in Florida is structurally
11 and systemically defective and inadequate. This assessment is
12 confirmed by the low grade – an “F” – assigned to Florida’s
13 transmission planning efforts by the 2025 Transmission Planning and
14 Development Report Card published in February 2026 by Americans
15 for a Clean Energy Grid, included as Exhibit TT-6 to my testimony.
16 Under the current federal framework (FERC Order No. 1000), the
17 Florida Reliability Coordinating Council (FRCC) conducts a Biennial
18 Transmission Planning Process. However, this process is structurally
19 dominated by the incumbent utilities themselves. When a regional

1 solution is proposed that might displace a utility's localized, capital-
2 intensive project, it is the incumbent utilities' own engineers who
3 evaluate it. Unsurprisingly, this self-grading system has produced a
4 staggering empirical result: since the inception of Order 1000 over a
5 decade ago, exactly zero regional transmission projects have been
6 selected, approved, or built through the FRCC process.

7

8 **Q. What does the failure of the Order 1000 process mean for this**
9 **specific docket?**

10 A. It means FPL cannot hide behind the FRCC. FPL cannot legitimately
11 argue that the Andytown-Oasis Project was thoroughly vetted
12 against regional alternatives when the historical record proves that
13 the FRCC's regional vetting process is a compliance fiction that
14 invariably defaults to localized utility buildouts. As a former
15 regulator, I can assure you that when the regional mechanism is
16 paralyzed by incumbent self-interest, the state commission must step
17 in and rigorously enforce its mandate to ensure the low-cost
18 electrical energy is capable of being dispatched.

19

1 **Q. How does the recent issuance of FERC Order No. 1920 impact FPL's**
2 **planning obligations?**

3 A. FERC Order No. 1920 was explicitly designed by the federal
4 government to fix the systemic failures of Order 1000. It mandates
5 that utilities adopt a modern, comprehensive, and forward-looking
6 approach to regional planning. Crucially, it requires transmission
7 providers to look holistically at long-term system needs and
8 rigorously evaluate whether "right-sizing" infrastructure or deploying
9 Advanced Transmission Technologies ("ATTs") and Grid-Enhancing
10 Technologies ("GETs") can resolve multiple local constraints through
11 highly efficient, shared regional facilities.

12

13 **Q. Is FPL embracing the modern planning principles of FERC Order No.**
14 **1920 with its proposed Andytown-Oasis Project?**

15 A. No, this application represents the exact opposite approach. Rather
16 than embracing the comprehensive, cost-sharing principles that
17 Order 1920 demands, FPL is presenting a narrowly tailored,
18 piecemeal local project. By rushing to authorize this capital-intensive,
19 strictly local solution right now, FPL is preemptively circumventing

1 the upcoming Order 1920 process. If utilities are permitted to solve
2 all of their isolated constraints piecemeal today, they will enter
3 future regional planning cycles claiming they have "no stated needs,"
4 ensuring that comprehensive regional projects never materialize. FPL
5 is using this state forum to lock in local capital expenditures before
6 the modern federal requirement for regional efficiency can take root.

7

8 **Q. What is your recommendation to the Commission regarding FPL's**
9 **attempt to dismiss regional solutions in this forum?**

10 A. The Commission must reject the argument that regional efficiencies
11 are outside the scope of this proceeding. The Andytown-Oasis
12 Project illustrates precisely why state commissions must demand
13 evidence of holistic planning. Approving this fragmented local project
14 without forcing FPL to genuinely evaluate regional economies of
15 scale and advanced technologies effectively rewards the
16 circumvention of federal planning goals and guarantees higher costs
17 for Florida ratepayers.

18

1 **Q. What is your ultimate recommendation to the Commission**
2 **regarding FPL's planning methodology?**

3 A. I recommend that the Commission view transmission expansion not
4 merely as a localized reliability bandage, but as a comprehensive tool
5 to mitigate economic risks for customers. Because FPL has failed to
6 simultaneously evaluate all benefit streams—including the
7 deployment of Grid-Enhancing Technologies and the profound
8 generation savings enabled by regional economic dispatch—the
9 Commission cannot conclude that this project represents the
10 optimal, lowest-cost solution for Florida.

11 While the Project will likely meet basic reliability criteria, it will
12 fail to satisfy the statutory criterion of ensuring abundant, low-cost
13 electrical energy to assure the economic well-being of the residents
14 and businesses of Florida because it will result in more costly electric
15 service and non-optimal development of the Florida transmission
16 grid over the medium term and long term.

17

18 **Q. What should the Commission do to ensure that FPL's and the**
19 **state's transmission needs are met in the manner that best meets**

1 **the statutory criteria and best serves the public interest of all**
2 **Floridians?**

3 The Commission should direct FPL to consider the regional needs
4 that were identified by FRCC through the last regional Biennial
5 Transmission Planning, and where those previous studies do not
6 appropriately reflect regional needs, conduct legitimate, robust
7 regional transmission planning studies consistent with the
8 requirements of the FERC's orders to determine which regional
9 needs could be jointly served by a transmission solution that meets
10 the purpose of the Project. The Commission should further require
11 that FPL engage all stakeholders in a timely way in those planning
12 studies, with stakeholders having full access to FPL's modeling in a
13 reasonable time frame.

14
15 **THE PROCEDURAL SCHEDULE IN THIS DOCKET FAILS TO PROVIDE**
16 **THE FLORIDA PSC WITH A COMPLETE AND RELIABLE EVIDENTIARY**

17 **RECORD**

18 **Q. Based on your experience as a former utility commissioner, what is**
19 **your opinion of the procedural schedule in this docket?**

1 A. During my tenure as Chairman of the Arkansas Public Service
2 Commission, I learned a fundamental truth about utility regulation: a
3 Commission is only as good as the evidentiary record placed before
4 it. Regulators rely entirely on the adversarial process to uncover the
5 truth about a project's cost-effectiveness. When, as is the case here,
6 the procedural schedule for this docket is so aggressively compressed
7 that it functionally hobbles intervenors, the adversarial process
8 breaks down and the Commission is left with an incomplete
9 evidentiary record. The Commission is left flying blind, forced to rely
10 almost exclusively on the utility's inherently biased, proprietary
11 modeling.

12
13 **Q. From a regulator's perspective, why are stakeholder and intervenor
14 perspectives so critical in transmission need determinations?**

15 A. Intervenors provide the essential crucible of independent scrutiny. A
16 utility like FPL has massive financial resources and spends months, if
17 not years, behind closed doors developing a highly polished
18 application that justifies its preferred capital expenditures. Without
19 robust intervenor participation, the Commission operates in an echo

1 chamber. Intervenors are the ones who stress-test the utility's
2 assumptions. They ask the hard questions about whether Grid-
3 Enhancing Technologies were bypassed, and they introduce
4 independent, regional data—like the constraint mapping provided in
5 the University of Florida analyses—that the utility conveniently left
6 out. Frankly, without the rigorous pushback and alternative solutions
7 provided by expert intervenors, a "need determination" degrades
8 into a mere rubber stamp for the utility's capital expansion plans.
9 These are the meaningful contributions that Intervenors in cases like
10 this can and do make, but only where they are provided with
11 adequate opportunities to participate fully in the regulatory process.

12

13 **Q. Given that context, does the 13-day window for intervenor**
14 **testimony in this docket allow for adequate stakeholder**
15 **engagement?**

16 A. Absolutely not. FPL filed its petition and supporting testimony on
17 March 11, 2026, with intervenor testimony due on March 24, 2026.
18 Allocating a mere 13 days to review hundreds of pages of highly

1 technical engineering filings, conduct substantive analysis, and draft
2 expert testimony is a structural barrier to meaningful participation.

3

4 **Q. Why is this ultra-compressed schedule particularly insufficient for a**
5 **transmission project of this nature?**

6 A. The complexity of modern transmission constraints requires deep,
7 incredibly thorough evaluation. You cannot adequately analyze
8 regional power flows, NERC reliability violations, and the viability of
9 alternative technologies in less than two weeks. The extreme
10 information asymmetry here is staggering. To even attempt to
11 provide meaningful feedback, organizations like the EDF had to
12 prospectively collaborate with the University of Florida to develop
13 independent transmission constraint maps. That level of
14 independent analysis is expensive, time-consuming, and inaccessible
15 to most ratepayers. A 13-day window all but ensures that highly
16 complex localized projects will get built simply because they were
17 filed, as no intervenor can realistically marshal the resources to fully
18 evaluate and contest the utility's models in that timeframe.

19

1 **Q. How does this lack of adequate review time contrast with modern**
2 **industry standards for transmission planning?**

3 A. It flies directly in the face of the robust stakeholder requirements
4 established by FERC Order No. 1920. The modern federal framework
5 explicitly recognizes that comprehensive, transparent stakeholder
6 engagement is absolutely vital for addressing the intricacies of the
7 grid and fulfilling the mandate to deliver cost-effective solutions for
8 consumers. FPL's reliance on this ultra-compressed, localized
9 proceeding paints a troubling picture: it suggests a planning culture
10 that actively avoids stakeholder perspectives and independent
11 scrutiny.

12
13 **Q. What is your ultimate conclusion regarding this procedural**
14 **timeline?**

15 A. A regulatory process that relies on a 13-day review window to
16 authorize hundreds of millions of dollars in ratepayer-funded
17 infrastructure is structurally flawed. It deprives the Florida Public
18 Service Commission of compelling, independent testimony and
19 severely narrows the range of perspectives considered. Ultimately, it

1 harms Florida ratepayers by ensuring the utility's plans face virtually
2 no meaningful technical challenges.

3 **SUMMARY AND CONCLUSIONS**

4 **Q. Please summarize the main conclusions of your testimony.**

5 A. FPL's and the FRCC's planning processes are not regional planning in
6 any meaningful way. They are localized processes that fail to consider
7 and address all meaningful options and opportunities that would
8 provide for optimal transmission investments that would serve the
9 public interest and best meet the criteria in the Transmission Line
10 Siting Act. The systemic defects in these planning processes are
11 compounded by the unreasonably short time frame provided for
12 intervenor participation in the planning processes and in the need
13 determination docket. Finally, FPL's and the FRCC's processes fail to
14 comply with the FERC's requirements in Orders 1920, 1920-A, and
15 1920-B, and accordingly, the Florida PSC should deny FPL's petition
16 and require FPL to conduct studies that comply with the FERC's orders.

17

1 **Q. Please summarize your ultimate recommendation to the**
2 **Commission regarding FPL's need determination petition for the**
3 **Andytown-Oasis Transmission Lines Project.**

4 A. The Commission should direct FPL to conduct legitimate, robust
5 regional transmission planning studies consistent with the
6 requirements of the FERC's orders. The Commission should further
7 require that FPL engage all stakeholders in a timely way in those
8 planning studies, with stakeholders having full access to FPL's
9 modeling in a reasonable time frame. The Commission should also
10 increase the period of time that interested parties have to file
11 intervenor testimony in transmission needs proceedings from the 13
12 days available in this proceeding to a minimum of 30 days.

13
14 **Q. Does this conclude your direct testimony?**

15 A. Yes.

1 BY MR. SCHEF WRIGHT:

2 Q Mr. Thomas, did you also identify, assemble
3 and cause to be filed with your March 24th testimony 15
4 exhibits that were identified in your testimony as
5 Exhibits Nos. TT-1 through TT-15?

6 A Yes, I did.

7 MR. SCHEF WRIGHT: Mr. Chairman, I note for
8 the record that those have been identified in the
9 comprehensive exhibit list as Exhibits 20 through
10 34.

11 CHAIRMAN CLARK: So noted.

12 MR. SCHEF WRIGHT: Thank you.

13 BY MR. SCHEF WRIGHT:

14 Q Mr. Thomas, will you please summarize your
15 testimony for the Commissioners?

16 A Yes, sir.

17 Q Thank you.

18 A Good morning, Mr. Chairman, members of the
19 Commission. My name is Ted Thomas, and I am testifying
20 today on behalf of the Environmental Defense Fund.

21 By way of background, my career in utility
22 regulation includes serving as an Administrative Law
23 Judge at the Arkansas Public Service Commission and also
24 as Chairman of the Arkansas Public Service Commission
25 from 2015 to 2022. I have also served as President of

1 the Organization of MISO States, which is the regulator
2 stakeholder group in the MISO stakeholder process, and
3 also on the NARUC electricity committee. I am the
4 Principal of Energize Strategies, a consulting firm.

5 I share this background because I know exactly
6 what it means to sit where you are sitting. I
7 understand the weight of the decisions you must make to
8 ensure system reliability and protect ratepayers, and
9 it's from that perspective that we are here today to
10 respectfully ask this commission to deny Florida Power &
11 Light's petition for the Andytown-Oasis project.

12 We are not making this request because we
13 oppose additional transmission facilities or grid
14 reliability. We are making this request because the
15 project of this magnitude, a \$782 million extra high
16 voltage transmission line, must be the culmination of a
17 transparent, robust and economically sound planning
18 process. The record before you shows that FPL's process
19 for the AOP facility was none of these things.

20 FPL is asking you to approve a nearly billion
21 dollar capital expenditure based on an outdated siloed
22 approach to transmission planning. When their internal
23 models identified a localized reliability constraint,
24 FPL immediately defaulted to a massive traditional wire
25 solution.

1 Crucially, they have failed to conduct the
2 legitimate robust regional transmission planning studies
3 required to protect Florida ratepayers. By artificially
4 narrowing their scope to localized worse case
5 reliability snapshot, FPL structurally excluded
6 cost-effective multi-value alternatives. They failed to
7 run the economic production cost models necessary to
8 determine if a broad regional solution could resolve
9 this need more cost-effectively.

10 They also failed to evaluate whether advanced
11 technologies and non-wire alternatives, such as battery
12 storage or grid enhancing technologies, could mitigate
13 the constraint at a fraction of the cost. Instead, FPL
14 and the FRCC relied on a closed loop system that merely
15 rubber stamps local builds. This methodology blatantly
16 ignores the binding federal mandates for transparent,
17 comprehensive and regional efficiency set forth by the
18 Federal Regulatory Energy Commission. In fact, FERC
19 Order 1920 explicitly found that the exact type of
20 legacy planning process FPL uses here, where a utility
21 retreats to its own footprint to build piecemeal
22 reliability only products produces outcomes that are
23 unjust and unreasonable.

24 Under Florida law, this commission has a
25 statutory duty to prevent uneconomic duplicative of

1 electric facilities. You cannot fulfill that duty if
2 the utility hides the math. A \$782 million localized
3 line is the very definition of uneconomic duplication if
4 a regional coordinated alternative could have solved the
5 problem.

6 A number of recommendations.

7 First, you should deny the petition.

8 Second, you should develop -- direct FPL to
9 reevaluate the actual system need using transmission
10 load growth as transparent load growth estimates and
11 permissible urgency -- emergency operating limits.

12 Third, you should direct FPL to return to the
13 drawing board and conduct legitimate robust regional
14 transmission planning.

15 Fourth, direct FPL to conduct comprehensive
16 production cost modeling to prove to the Commission that
17 its chosen solution is the most cost-effective solution.

18 Fifth, you should mandate FPL evaluate
19 portfolios of non-wire alternatives, specifically
20 including grid enhancing technologies and battery
21 storage to see if a combined approach alongside other
22 construction schemes solve the reliability problem.

23 Sixth, and finally, require FPL to engage all
24 stakeholders in a timely manner by filing a full
25 transparent access to their modeling.

1 Thank you.

2 **Q Thank you, Mr. Thomas.**

3 MR. SCHEF WRIGHT: Mr. Chairman, all the
4 parties have waived cross. If the Commissioners
5 have questions, he is available for your questions.

6 CHAIRMAN CLARK: Thank you.

7 Commissioners, questions? Seeing none.

8 MR. SCHEF WRIGHT: And at this time, I would
9 respectfully move Exhibits 20 through 34 into the
10 record.

11 CHAIRMAN CLARK: Without objection, so
12 ordered.

13 MR. MARQUEZ: Staff would recommend that
14 Exhibits 21 through 24 not be entered because,
15 again, those are cumulative with the previously
16 entered 10 through 13.

17 CHAIRMAN CLARK: All right. So 20 through 34
18 without 21 through 24, that's staff's analysis?

19 MR. MARQUEZ: Correct.

20 MR. SCHEF WRIGHT: Just so I am clear, 20
21 comes in. It's 21 through 24 that are --

22 CHAIRMAN CLARK: 21 through 24 that are --

23 MR. SCHEF WRIGHT: -- recognized as
24 duplicative of Mr. Cranston's exhibits?

25 CHAIRMAN CLARK: Yes, sir.

1 MR. SCHEF WRIGHT: Yes, that's fine. We want
2 to avoid uneconomic duplication.

3 CHAIRMAN CLARK: All right. Without
4 objections, so ordered.

5 (Whereupon, Exhibit Nos. 20 & 25-34 were
6 received into evidence.)

7 MR. SCHEF WRIGHT: Thank you.

8 And with his exhibits having been entered, I
9 would ask that Mr. Thomas be excused.

10 CHAIRMAN CLARK: Mr. Thomas is excused.

11 THE WITNESS: Thank you, sir.

12 MR. SCHEF WRIGHT: Thank you.

13 (Witness excused.)

14 CHAIRMAN CLARK: All right. We are moving to
15 rebuttal witnesses. Mr. Cox.

16 MR. COX: Thank you, Commissioner Clark.

17 FPL calls its next witness, Andrew McLain.

18 Whereupon,

19 ANDREW McLAIN

20 was called as a witness, having been previously duly
21 sworn to speak the truth, the whole truth, and nothing
22 but the truth, was examined and testified as follows:

23 EXAMINATION

24 BY MR. COX:

25 Q Good morning, Mr. McLain.

1 A Good morning.

2 Q Can you please state your name for the record?

3 A My name is Andrew McLain.

4 Q Have you been sworn in for this hearing?

5 A I have.

6 Q What is your business address?

7 A My business address is Florida Power & Light
8 Company, 15430 Endeavor Drive, Jupiter, Florida. ZIP
9 Code 33478.

10 Q And by whom are you employed and in what
11 capacity?

12 A I'm employed by Florida Power & Light Company,
13 and my title is Senior Director of Integrated System
14 Planning and Strategy.

15 Q On whose behalf are you testifying in this
16 proceeding for your rebuttal testimony?

17 A Florida Power & Light Company.

18 Q Did you cause to be filed on March 30th of
19 2026 nine pages of rebuttal testimony in this
20 proceeding?

21 A Yes, I did.

22 Q Do you have any changes or corrections to your
23 testimony at this time?

24 A No, I do not.

25 Q If I were to ask you the same questions today

1 as contained in your prefiled rebuttal testimony as
2 filed on March 30th, 2026, would your answers be the
3 same?

4 A Yes.

5 Q Thank you.

6 MR. COX: Commissioners, FPL would request
7 that Mr. McLain's March 30th, 2026, prefiled
8 rebuttal testimony be inserted into the record as
9 though read.

10 CHAIRMAN CLARK: So ordered.

11 MR. COX: Thank you.

12 (Whereupon, prefiled rebuttal testimony of
13 Andrew McLain was inserted.)

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 20260020-EI
FLORIDA POWER & LIGHT COMPANY
REBUTTAL TESTIMONY OF ANDREW MCLAIN

Filed: March 30, 2026

1

I. INTRODUCTION

2 **Q. Please state your name, business address, employer and position.**

3 A. My name is Andrew McLain. My business address is 15430 Endeavor Drive, Jupiter,
4 Florida 33478. I am employed by Florida Power & Light Company (“FPL” or the
5 “Company”) as Senior Director, Integrated Strategic Planning.

6 **Q. Please describe your duties and responsibilities in that position.**

7 A. Currently, I am the Senior Director of Integrated System Planning and Strategy. In this
8 role, I oversee our transmission services group and am involved in many regulatory
9 and strategic aspects of FPL’s transmission organization.

10 **Q. Please describe your educational background and professional experience.**

11 A. I have B.A. degrees in Geology and Environmental Studies from Bucknell University,
12 a Juris Doctor from Vermont Law School and an M.B.A. from the University of
13 Virginia’s Darden School of Business. I have spent the last 20 years of my career
14 focused on the energy industry. I started my career in the federal government, working
15 for the U.S. Department of Energy and Federal Energy Regulatory Commission
16 (“FERC”) as an attorney. I then moved to private practice as an attorney at Bracewell,
17 focusing on energy regulatory issues. I joined FPL in 2024 as a Senior Director of
18 Transmission Strategy. Before joining FPL, I worked for NorthWestern Energy, where
19 I focused on regional energy markets and transmission development. I also managed
20 NorthWestern Energy’s FERC Compliance office for 12 years, where I was responsible
21 for all aspects of FERC and NERC compliance, reporting directly to NorthWestern
22 Energy’s Board of Directors.

1 **Q. Have you previously submitted testimony in this proceeding?**

2 A. No.

3 **Q. What is the purpose of your rebuttal testimony in this proceeding?**

4 A. The purpose of my rebuttal testimony is to respond to the direct testimony submitted
5 on behalf of the Environmental Defense Fund, Inc. (“EDF”) by its witnesses Ted J.
6 Thomas and David Cranston regarding FERC Orders 1000 and 1920 and FPL’s Petition
7 for Determination of Need for the Andytown-Oasis Transmission Lines Project (the
8 “AOP” or “Project”) filed with the Florida Public Service Commission (“FPSC” or
9 “Commission”).¹

10 **Q. Did you review the direct testimony of EDF witnesses Thomas and Cranston?**

11 A. Yes, I reviewed the direct testimonies of EDF witnesses Thomas and Cranston and
12 considered the arguments they raised regarding the alleged relevance of FERC Orders
13 1000 and 1920 to FPL’s petition for Determination of Need for approval of the AOP
14 Project.

15 **Q. Please summarize your rebuttal testimony.**

16 A. My rebuttal testimony explains that EDF’s witnesses’ opinions concerning compliance
17 with FERC’s transmission planning requirements are irrelevant, beyond the
18 Commission’s jurisdiction, and should be disregarded by the Commission. The
19 Commission should reject EDF’s efforts to turn this proceeding into a forum to
20 complain about FERC’s current regional planning process or adjudicate how the

¹ FPL is submitting the rebuttal testimony of FPL witness McLain out of an abundance of caution to fully rebut the issues raised by EDF witnesses Cranston and Thomas. However, such testimony should not be construed or interpreted to imply that FPL agrees, concedes, or otherwise acquiesces that the EDF witnesses’ testimony and exhibits regarding the current FERC Order 1000 regional planning process and future FERC Order 1920 regional planning process are relevant to the Commission’s need determination under Section 403.537, F.S., pursuant to the Transmission Lines Siting Act (“TLSA”), Section 403.52-403.5365, F.S., or within the Commission’s jurisdiction.

1 forthcoming regional planning reforms pursuant to FERC Order 1920 should be
2 implemented and applied. It is not appropriate or ripe to adjudicate FPL’s yet-to-be-
3 filed FERC Order 1920 compliance filing in this Docket before this Commission. EDF
4 is a national advocacy organization that is attempting to disparage the merits of FPL’s
5 regional planning practices in order to obfuscate the very real Florida-specific local
6 area reliability issues detailed in the direct testimony of FPL witness Miguel Yanes.
7 To the extent EDF is concerned about FPL’s compliance with FERC’s regional
8 planning requirements, the proper forum for those complaints is FERC. The
9 Commission should therefore reject the arguments of the EDF witnesses when
10 considering FPL’s Petition for Need Determination.

11

12 **II. EDF ARGUMENTS REGARDING FERC ORDER 1920**

13 **Q. The EDF witnesses argue that the Project is inconsistent with federal transmission**
14 **planning requirements under FERC Order 1920. Is that the issue before the**
15 **Commission in this docket?**

16 **A.** No. The issue before the Commission is whether the Project is needed based on the
17 criteria in the Florida need determination statute, Section 403.537, Florida Statutes, as
18 required for certification of the Project under the TLISA. This proceeding is not a forum
19 for adjudicating compliance with FERC’s federal transmission planning rules or the
20 development of related future planning processes under FERC Order 1920 that do not
21 yet exist in any operative form and will not go into effect for Florida’s three
22 FERC-jurisdictional transmission providers, FPL, Duke Energy Florida (“DEF”), and
23 Tampa Electric Company (“TECO”) until January 1, 2028. Accordingly, the

1 Commission need not await the outcome of the multi-year FERC implementation
2 proceeding for FERC Order 1920 to determine whether the AOP is needed under
3 Section 403.537, Florida Statutes, in this proceeding.

4 **Q. Has EDF been an active participant in the FERC Order 1920 proceeding?**

5 A. Yes. EDF has been an active Order-1920 participant at FERC from the start of the
6 rulemaking proceeding, mainly through joint Public Interest Organization filings at
7 FERC, a 2024 rehearing/clarification request, and then judicial review in the Fourth
8 Circuit Court of Appeals challenging parts of the final rule while supporting the rule's
9 overall framework.

10 **Q. Do you know the FERC-mandated implementation timeline for FPL and other
11 Florida transmission providers to comply with FERC Order 1920?**

12 A. Yes. The compliance filing date for the Florida transmission providers has been
13 extended to June 12, 2026. FPL, together with DEF and TECO, has been working with
14 the Florida Reliability Coordinating Council ("FRCC"), its members, and stakeholders
15 to draft amendments to their respective Open Access Transmission Tariffs to comply
16 with FERC Order 1920 and establish a planning process that is open, transparent, and
17 designed to identify more efficient or cost-effective long-term regional transmission
18 solutions as required by FERC Order 1920. After FPL's FERC compliance filing is
19 submitted on or before June 12, 2026, the first FRCC planning cycle under FERC Order
20 1920 would start on January 1, 2028, and would conclude no later than January 1, 2031.
21 Accordingly, there currently is no FERC-approved Order 1920 transmission planning
22 process in effect for FPL, and the completion of the first planning cycle under that

1 process is still several years away. Importantly, it is FERC that will review and approve
2 the future FERC Order 1920 compliance filings.

3 **Q. Do you believe EDF is aware of the implementation timeline for FERC Order**
4 **1920?**

5 A. Yes. The orders are all available on FERC's public eLibrary webpage. Given EDF's
6 extensive advocacy focused on FERC Order 1920 and participation as a stakeholder in
7 the FRCC's Order 1920 filing process, I believe EDF is or should be aware that the
8 compliance filings for the Florida transmission providers are still being developed and
9 not due to be filed at FERC until June 12, 2026, and that the first planning cycle under
10 FERC Order 1920 would start on January 1, 2028, and conclude no later than January
11 1, 2031.

12 **Q. Is the Commission required to delay a needed transmission project pending future**
13 **state or federal regional planning reforms and processes?**

14 A. No. For a transmission need determination petition like this one for the AOP, Section
15 403.537, Florida Statutes, requires that the Commission must determine whether a
16 proposed transmission facility is needed to ensure reliable service and provide
17 abundant, low-cost electric energy. Nothing in state or federal law or regulations
18 requires the Commission to defer action on an identified reliability need while awaiting
19 changes to future federal planning processes and the development of associated
20 regional projects. Stated simply, this proceeding is not the forum to make such future
21 transmission planning process changes.

1 **Q. The EDF witnesses assert that FPL’s and FRCC’s processes “fail to comply with”**
2 **FERC Order 1920. Is that accurate?**

3 A. No. Again, FERC’s Order 1920 establishes a prospective regulatory framework that
4 must first be implemented through compliance filings and FERC approval before any
5 substantive planning obligations attach. The rule expressly requires each transmission
6 provider to submit a compliance filing revising its tariff to implement Long-Term
7 Regional Transmission Planning and related requirements. Only *after* those filings
8 are accepted does the new planning regime begin to govern utility conduct. In the
9 case of Florida, the first planning cycle under FERC Order 1920 would start on
10 January 1, 2028, and conclude no later than January 1, 2031. Thus, as of the date of
11 the EDF witnesses’ testimony (March 24, 2026), FERC has not yet received or
12 reviewed FPL’s proposed FERC Order 1920 tariff amendments.

13 **Q. EDF witness Thomas argues that approving the AOP Project would “circumvent”**
14 **FERC Order 1920. Is that accurate?**

15 A. No. The witness’s argument rests on a fundamental chronological error – it assumes
16 that binding FERC Order 1920 obligations are already operative today. However, as
17 explained above, those obligations have not yet taken effect for Florida transmission
18 providers, and the FERC Order 1920 planning processes the EDF witnesses attempt to
19 invoke do not yet exist in any operative form. FERC Order 1920 does not prohibit
20 utilities from addressing current, enforceable reliability needs in the interim, nor does
21 it require deferral of necessary projects pending future regional studies. Nothing in
22 FERC Order 1920 suspends a utility’s obligation to comply with mandatory NERC

1 reliability standards today or otherwise delay projects that are necessary to ensure
2 reliable electric service for customers.

3 **Q. EDF witness Thomas asserts that approval of the AOP Project would “artificially**
4 **foreclose” future benefits of regional planning and “reduc[e] FPL’s obligations**
5 **under FERC Order 1920 to a mere paper exercise.” Do you agree?**

6 A. No. The structure of FERC Order 1920 itself undercuts the notion of “preemptive
7 foreclosure.” The rule recognizes that transmission planning is an iterative, ongoing
8 process and does not prohibit or invalidate local or near-term projects developed
9 outside the long-term planning cycle. Instead, it supplements existing planning
10 processes by requiring transmission providers to incorporate long-term, regional
11 considerations going forward. In other words, FERC Order 1920 does not freeze the
12 grid pending future planning cycles; it overlays a new framework that operates
13 prospectively alongside existing planning practices. Accordingly, the Project does not
14 foreclose or prejudice any future regional transmission development.

15 **Q. Do you have any closing remarks in rebuttal to the EDF witnesses regarding FPL**
16 **compliance with FERC Order 1920?**

17 A. Yes. There is no merit to EDF’s witnesses’ testimony because their comments are
18 neither ripe nor placed in the correct forum. On the one hand, they are insinuating that
19 FPL’s planning process is somehow flawed because it fails to use federal tariff
20 amendments for FERC Order 1920 that have yet to be filed or approved by FERC, and,
21 on the other hand, they are ignoring that future Order 1920 outcomes are not a
22 prerequisite to acting here. If EDF has concerns about FPL’s yet-to-be-filed FERC
23 Order 1920 compliance filing, it can lodge those comments for FERC consideration at

1 an appropriate future time – not force their narrative from the national level into state
2 commission proceedings.

3

4

III. CONCLUSION

5 **Q. What is your overall conclusion regarding the EDF testimony as it relates to the**
6 **application of FERC Order 1920 to the AOP Project?**

7 A. The testimony of EDF witnesses Thomas and Cranston is attempting to conflate a state
8 jurisdictional need determination with a federal policy issue on a yet-to-be-
9 implemented FERC order. Likewise, their testimony does not respect the proper
10 relationship between FERC Order 1920 and the local transmission need for the AOP
11 as further explained by FPL witness Yanes in his rebuttal testimony. FERC Order 1920
12 neither limits FPL's ability to propose, construct, and operate the Project as a local
13 transmission project nor does it limit the Commission's authority to approve the Project
14 under the Florida need determination statute, Section 403.537, Florida Statutes, as
15 required for certification of the Project under the TLSA. Any arguments concerning
16 FERC Order 1920 are clearly premature in any event. EDF will have a time and
17 opportunity to provide input and contest FERC Order 1920 implementation at FERC.
18 But that time and place is not here and now before this Commission.

19 **Q. Does this conclude your rebuttal testimony?**

20 A. Yes.

1 BY MR. COX:

2 Q Mr. McLain, have you prepared a summary of
3 your prefiled rebuttal testimony?

4 A Yes, I have.

5 Q Could you please present that summary to the
6 Commission at this time?

7 A Good morning, Mr. Chairman and Commissioners.
8 My name is Andrew McLain. I am the Senior Director of
9 Integrated System Planning and Strategy at Florida Power
10 & Light Company.

11 In my role, I oversee the transmission
12 services organization. I am involved in regulatory and
13 strategic matters involving transmission development,
14 including compliance with federal transmission planning
15 requirements.

16 My rebuttal testimony responds to arguments
17 raised by Environmental Defense Fund witnesses Ted
18 Thomas and David Cranston regarding Federal Energy
19 Regulatory Commission Orders 1000 and 1920, and their
20 alleged relevance to the Commission's consideration of
21 the AOP project. Those arguments are misplaced.

22 The issue before this commission is whether
23 the AOP is needed under Florida law. Specifically, the
24 Florida need determination statute, Section 403.537.
25 Not whether FPL has complied with any future federal

1 transmission planning requirements which fall under
2 FERC's jurisdiction.

3 EDF's suggestion that approving the AOP would
4 somehow circumvent Order 1920 rests on a fundamental
5 timing error. There is no FERC approved Order 1920
6 planning process in effect today, and nothing in federal
7 law requires deferring a needed state jurisdictional
8 reliability project while awaiting speculative future
9 planning obligations.

10 If EDF has concerns about FPL's future Order
11 1920 compliance process, the appropriate forum is FERC.
12 This commission should, therefore, disregard EDF's
13 federal policy arguments and decide this case based on
14 the demonstrated local reliability need under Section
15 403.537.

16 Thank you.

17 **Q Thank you.**

18 MR. COX: Mr. McLain is available for
19 questions.

20 CHAIRMAN CLARK: Commissioners, any questions?
21 Seeing none.

22 MR. COX: Thank you. And no exhibits for
23 Mr. McLain.

24 CHAIRMAN CLARK: Would you like your witness
25 excused?

1 MR. COX: May be the witness be excused?

2 (Witness excused.)

3 CHAIRMAN CLARK: All right. Call your next
4 witness.

5 MR. COX: Thank you, Commissioner Clark. FPL
6 calls its next witness Miguel A. Yanes.

7 Whereupon,

8 MIGUEL A. YANES

9 was recalled as a witness, having been previously duly
10 sworn to speak the truth, the whole truth, and nothing
11 but the truth, was examined and testified as follows:

12 EXAMINATION

13 BY MR. COX:

14 Q Good morning again, Mr. Yanes. Could you
15 please state your name for the record?

16 A Good morning. My name is Miguel A. Yanes.

17 Q And, Mr. Yanes, you have been sworn in for
18 this hearing, correct?

19 A That's correct.

20 Q What is your business address?

21 A My business address is 4200 West Flagler
22 Street, Miami, Florida, 33134.

23 Q And by whom are you employed and in what
24 capacity?

25 A Florida Power & Light. I am the Senior

1 Director of Transmission and Substation Field
2 Operations.

3 Q And on whose behalf are you testifying in this
4 proceeding for your rebuttal testimony?

5 A Florida Power & Light.

6 Q Did you cause to be filed on March 30th, 2026,
7 19 pages of rebuttal testimony in this proceeding?

8 A Yes.

9 Q Do you have any changes or corrections to your
10 testimony today?

11 A No.

12 Q If I were to ask you the same questions as
13 contained in your prefiled rebuttal testimony as filed
14 on March 30th, 2026, would your answers be the same?

15 A Yes.

16 MR. COX: Commissioners, FPL would request
17 that Mr. Yanes' March 30th, 2026, prefiled rebuttal
18 testimony be inserted in the record as though read.

19 CHAIRMAN CLARK: So ordered.

20 (Whereupon, prefiled rebuttal testimony of
21 Miguel A. Yanes was inserted.)

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 20260020-EI
FLORIDA POWER & LIGHT COMPANY
REBUTTAL TESTIMONY OF MIGUEL A. YANES

Filed: March 30, 2026

1 **I. INTRODUCTION**

2 **Q. Please state your name, business address, employer and position.**

3 A. My name is Miguel A. Yanes. My business address is 4200 W. Flagler Street, Miami,
4 Florida 33134. I am employed by Florida Power & Light Company (“FPL” or the
5 “Company”) as Senior Director, Transmission and Substation Operations.

6 **Q. Have you previously submitted direct testimony in this proceeding?**

7 A. Yes.

8 **Q. Are you sponsoring any rebuttal exhibits in this case?**

9 A. Yes. I am sponsoring the following rebuttal exhibits:

- 10 • Exhibit MAY-5 FPL’s Response to Staff’s First Set of Interrogatories, No. 15
11 • Exhibit MAY-6 FPL’s Responses to Staff’s First Set of Interrogatories, Nos. 9
12 and 11

13 **Q. What is the purpose of your rebuttal testimony?**

14 A. The purpose of my rebuttal testimony is to respond to the direct testimony submitted
15 on behalf of the Environmental Defense Fund, Inc. (“EDF”) witnesses Ted J. Thomas
16 and David Cranston, both of whom oppose FPL’s Petition for Determination of Need
17 for the Andytown-Oasis Project (“AOP” or “Project”).

18 **Q. Did you review the direct testimonies of EDF witnesses Thomas and Cranston?**

19 A. Yes, I reviewed their direct testimonies and considered the arguments they raised
20 regarding the FPL and Florida Reliability Coordinating Council (“FRCC”) transmission planning processes, federal transmission policy, and alleged impacts to
21 FPL customers.
22

1 **Q. Please summarize your rebuttal testimony.**

2 A. My rebuttal testimony explains that EDF witnesses Thomas and Cranston do not
3 contest or otherwise challenge the need for the AOP but, instead, rely on federal policy
4 advocacy coupled with speculative future planning processes that fall outside the scope
5 of this proceeding, as further explained in the rebuttal testimony of FPL witness
6 McLain.¹ My testimony also explains that EDF’s recommendation that the undisputed
7 need be addressed through a regional transmission solution developed under a future,
8 yet-to-be implemented new regional transmission planning process is fundamentally
9 flawed and would jeopardize the safe and reliable service to customers in Miami-Dade
10 County. I also rebut EDF’s claims that FPL failed to consider alternative solutions, as
11 well as their assertions that the AOP will increase costs or foreclose future economic
12 benefits for FPL customers.

13

14 **II. The Need for the AOP is Undisputed**

15 **Q. Please summarize the need that forms the basis for the proposed AOP.**

16 A. As explained in detail in my direct testimony and supporting exhibits, FPL’s 2025
17 transmission planning studies identified that FPL’s existing transmission network will
18 not be able to support the growing load demand in Miami-Dade County by 2033, and
19 that a new transmission solution is required to address identified North American
20 Electric Reliability Corporation (“NERC”) Reliability Standards TPL-001-5.1 and

¹ FPL is submitting the rebuttal testimony of FPL witness McLain out of an abundance of caution to fully rebut the issues raised by EDF witnesses Cranston and Thomas. However, such testimony should not be construed or interpreted to imply that FPL agrees, concedes, or otherwise acquiesces that the EDF witnesses’ testimony and exhibits regarding the current FERC Order 1000 regional planning process and future FERC Order 1920 regional planning process are relevant to the Commission’s need determination under Section 403.537, F.S., pursuant to the Transmission Lines Siting Act (“TLSA”), Section 403.52-403.5365, F.S., or within the Commission’s jurisdiction.

1 NUC-001-4 violations in Miami-Dade County beginning in 2033. Violations of these
2 mandatory NERC reliability standards may result in significant penalties, including
3 monetary penalties assessed on a per-day basis, and failure to resolve identified
4 reliability violations can lead to serious negative operational consequences, including
5 load shedding and broader impacts affecting both FPL's system and the interconnected
6 electric grid.

7 **Q. Do either of the EDF witnesses dispute or challenge the need for the Project?**

8 A. No. Notably, neither EDF witness Thomas nor EDF witness Cranston dispute the need
9 for the AOP as explained and demonstrated in my direct testimony. Neither EDF
10 witness provides transmission assessments, power flow analysis, or reliability
11 modeling disputing the demonstrated need for the AOP. The EDF witnesses likewise
12 do not dispute or otherwise challenge that timely completion of the AOP will fully
13 address and resolve these reliability violations and maintain transmission reliability for
14 FPL customers in Miami-Dade County. Rather, the EDF witnesses dedicate the
15 majority of their testimony advocating for a regional transmission solution developed
16 under a future, yet-to-be implemented new regional transmission planning process
17 pursuant to the Federal Energy Regulatory Commission ("FERC") Order 1920. As
18 explained in detail below, such a regional transmission approach for the AOP project
19 recommended by the EDF witnesses is fundamentally flawed and would jeopardize the
20 safe and reliable service to customers in Miami-Dade County.

1 **Q. Does EDF witness Cranston’s commissioned report (Exhibit DC-2) impact or alter**
2 **the NERC reliability violations identified by FPL’s transmission planning study?**

3 A. No. EDF’s commissioned and co-authored report, in partnership with the University
4 of Florida, on transmission in the state of Florida is performed utilizing a transmission
5 model that is incomplete² and inaccurate that was built utilizing, per their own
6 admission, outdated, assumed, and estimated data. As a result, the assessment does not
7 reflect a credible analysis that is sound and compliant with NERC reliability standard
8 TPL-001-5.1 nor does it include the specific voltage requirements associated with
9 Turkey Point Nuclear plant interface requirement as mandated by NERC reliability
10 standard NUC-001-4. Finally, EDF’s report provides no analysis of the specific
11 contingency events that are the drivers of the NERC reliability violations identified in
12 Miami-Dade County.

13 **Q. Is the use of a statewide production model used in EDF’s commissioned report**
14 **appropriate modeling methodology for Florida?**

15 A. No. A statewide production cost model is not appropriate for Florida when used as the
16 primary basis for transmission planning or reliability determinations. Florida’s electric
17 system is operated by vertically integrated utilities that plan generation, transmission,
18 and distribution on a coordinated, utility-specific basis under Florida Public Service
19 Commission (“FPSC” or “Commission”) oversight. Each investor-owned utility
20 independently owns and plans its generation resources and is required to maintain
21 Commission-approved planning reserve margins to ensure reliable service.

² Section 3.2.1 of the EDF-commissioned report states, “*Intra-county lines are excluded from the model because internal connections within a node do not affect power flow calculations between distinct county nodes.*”

1 A statewide production cost modeling methodology, as included in EDF's
2 commissioned report, aggregates all generation resources across the state, regardless of
3 ownership, and dispatches those resources to serve statewide load. This approach
4 inherently assumes centralized dispatch and pooled resources, which does not reflect
5 Florida's vertically integrated utility structure, where each investor-owned utility
6 independently owns and plans its generation resources and is required to maintain
7 FPSC mandated reserve margins to reliably serve its own customers.

8

9 While statewide or regional production cost models may be informative for high-level
10 policy or market analyses, they do not adequately capture localized transmission
11 constraints, contingency performance, or utility-specific system characteristics
12 necessary to assess compliance with applicable reliability standards or to determine the
13 need for specific transmission facilities within Florida. Production cost models are
14 designed primarily to evaluate economic dispatch, fuel costs, and generation utilization
15 over broad geographic areas. As such, they rely on aggregated system representations
16 and simplified transmission assumptions that are not intended to assess detailed power
17 flow behavior, voltage performance, or facility-specific thermal loading under NERC
18 contingency conditions.

19 **Q. Can you briefly explain other limitations of EDF's commissioned report on**
20 **Florida's electric transmission system?**

21 A. As stated by EDF, the purpose of this commissioned report was to allegedly understand
22 the regional transmission needs of Florida, not evaluate the need for the AOP or
23 whether that need could be addressed through an alternative transmission solution. The

1 following omissions preclude any meaningful assessment of system reliability or
2 congestion as evaluated in transmission planning practice:

- 3 • **Omission of intra-county transmission lines** - All intra-county transmission
4 lines are omitted from the production cost model based on the incorrect
5 assumption that internal system behavior is irrelevant to system performance.³
6 In reality, the need for the Project is driven by low-voltage conditions within
7 Miami-Dade County, conditions that arise from internal system limitations that
8 are explicitly excluded from EDF's commissioned report.
- 9 • **Omission of actual facility-specific transmission ratings** – Actual facility-
10 specific transmission line ratings and impedances (impedance is the parameter
11 that determines how much power will flow in any particular line, and it is a
12 specific characteristic of the specific conductor used in the transmission line)
13 are not used.⁴ Transmission line ratings are not homogeneous within a voltage
14 class and cannot be treated as a single assumed value without materially
15 distorting system capability. For example, a 230kV transmission line within
16 FPL's system can range from ~1,200 amps (478 MVA) to more than 3,800
17 amps (1,518 MVA).
- 18 • **Omission of generation specific inputs** – EDF's co-authored report admits to
19 utilizing assumptions or approximations rather than generation specific inputs⁵
20 (e.g., ramp rates, minimum run times, startup costs, startup times, and heat

³ *Id.*

⁴ Section 3.1 of the EDF commissioned report states, “We approximate transmission line capacity and line susceptance based on voltage level, line type, line length, and standard material characteristics.”

⁵ Section 3.1 of the EDF commissioned report states, “Because detailed data on marginal generation cost and transmission line parameters are not readily available, we estimate marginal generation costs using generator technology type, heat rate, fuel price, and typical variable operating and maintenance costs.”

1 rates). These parameters materially affect dispatch outcomes, congestion
2 patterns, and production cost results, and the use of generalized assumptions
3 introduces additional uncertainty into the analysis. Moreover, the model does
4 not appear to incorporate fuel transportation limitations, or firm gas pipeline
5 capacity contracts. These factors are critical to realistic dispatch outcomes and
6 to achieve a production cost that is meaningful, particularly under stressed
7 system conditions.

- 8 • **Non-existent lines** – EDF Witness Cranston on Pg. 21 of his testimony
9 references several times, a “Hendry to Palm Beach line.” However, this line
10 does not exist. It appears that the EDF commissioned report utilizes proxy lines,
11 rather than actual lines with appropriate starting and ending points at
12 substations.

13
14 Ultimately, EDF’s co-authored report does not represent actual facility ratings, voltage
15 limited conditions, or realistic dispatch behavior, and its unrealistic cost conclusions
16 rely on maintaining peak condition savings across all hours and decades.⁶

⁶ Section 4.6 of the EDF commissioned report states, “we calculate the total economic benefit of the line expansion. We take the hourly cost difference compared to the Base Case and multiply it by 8,760 hours to determine the annual cost savings. We then multiply by 20 years to account for the length of time over which the benefit will be accrued.”

1 **III. EDF's Reliance on Regional Planning is Misplaced**

2 **Q. The EDF witnesses argue that FPL should undertake a regional transmission**
3 **planning process to evaluate the need and identify a regional transmission**
4 **solution. Do you have a response?**

5 A. Yes. The AOP is a localized solution needed to address a specific, documented, and
6 uncontested reliability need in Miami-Dade County (the southernmost load in FPL's
7 system). Identifying and solving localized reliability constraints is a fundamental and
8 appropriate function of transmission planning, particularly in a geographically
9 constrained and highly load-dense area like Miami-Dade County. It is important to
10 remember that Miami-Dade County is itself an electrical peninsula, it is constrained by
11 Everglades National Park to the west and the Atlantic Ocean to the east. As a result, a
12 local area problem needs a local area solution such as the AOP.

13 **Q. EDF witness Thomas quotes the direct testimony of FPL witness Scott Bores in**
14 **FPL's 2025 rate case and argues FPL's executive management has identified that**
15 **the primary threat to the Florida grid, and specifically to the South Florida load**
16 **center, is a lack of regional connectivity and transmission import capacity. Do**
17 **you have a response?**

18 A. Yes. I disagree with EDF's characterization of Mr. Bores' testimony. The testimony
19 of Mr. Bores referenced by EDF witness Thomas was describing the risks related to
20 FPL's physical infrastructure and, in particular, the risk of limited electrical
21 interconnection capacity serving Florida due to its unique peninsular geography. The
22 selective quote by EDF witness Thomas is taken out of context and does not stand for
23 the proposition that FPL's management is somehow advocating for the advancement

1 of regional transmission solutions to address localized transmission problems or that
2 FPL should not pursue local transmission solutions when appropriate. Rather, Mr.
3 Bores' testimony supports the proposition that the AOP is necessary and appropriate to
4 address the local violations of the mandatory NERC Reliability Standards TPL-001-
5 5.1 and NUC-001-4 in Miami-Dade County, which need is not disputed by EDF.

6 **Q. EDF witness Thomas contends that the FRCC transmission planning process**
7 **reflects a siloed or localized planning approach. Do you agree?**

8 A. No, the FRCC is not "siloed." FRCC's biannual regional planning process looks at the
9 entire state of Florida and determines if there is a more cost-efficient regional project.
10 Under the FRCC's Cost Effective and Efficient Regional Transmission Solutions
11 ("CEERT") framework, a potential CEERT project must meet defined threshold
12 criteria, meet all applicable NERC and FRCC reliability criteria when modeled without
13 the displaced facilities. Many transmission needs in Florida, including those driven by
14 localized thermal overloads or voltage performance under contingency conditions, do
15 not meet these regional displacement criteria. Such needs are often specific to a
16 particular utility's service territory, load pocket, or transmission corridor and are
17 required to maintain compliance with NERC reliability standards regardless of broader
18 regional system conditions. As a result, these projects are appropriately identified and
19 addressed through utility-specific transmission planning, even though they are
20 reviewed and coordinated regionally through the FRCC planning process. Importantly,
21 however, AOP was not identified through FRCC's biannual regional planning which
22 officially concluded June 2025. The AOP is a local project designed to address a local
23 area problem that cannot be cost-efficiently addressed by a regional project.

1 **Q. Does the existence of the FERC and FRCC regional planning processes eliminate**
2 **the need for local reliability projects?**

3 A. No. The FERC Order 1000 regional planning process as governed by FERC
4 requirements and executed by the FRCC and utility local reliability planning processes
5 serve complementary purposes, addressing both regional and local area deficiencies.

6 **Q. The EDF witnesses recommend that the Commission should direct FPL to**
7 **conduct regional transmission planning studies consistent with FERC Order 1920.**
8 **Do you have a response?**

9 A. Yes. FPL's compliance filing date for FERC Order 1920 is June 12, 2026. FPL has
10 been working with the FRCC, its members, and stakeholders to draft the FERC Order
11 1920 compliance filing language. After FPL's FERC compliance filing is submitted
12 on or before June 12, 2026, the first planning cycle under FERC Order 1920 would
13 start on January 1, 2028. Importantly, the conclusion of the first planning cycle under
14 Order 1920 will be by no later than January 1, 2031. Accordingly, there currently is
15 no FERC-approved Order 1920 transmission planning process for FPL and the
16 completion of the first planning cycle under that process is still several years away.

17 **Q. Couldn't FPL delay initiation of the AOP Project until the completion of the**
18 **FERC Order 1920 study in January 2031?**

19 A. No, there would be insufficient time from the conclusion of the FERC Order 1920 study
20 in January 2031 to begin the process of building the AOP project. As explained in my
21 direct testimony, this project must be completed by December 2033 in order to maintain
22 compliance with the NERC Reliability Standards based on the most recent transmission
23 planning assessment studies. In order to meet this in-service date and avoid

1 transmission reliability needs for Miami-Dade County, FPL must stagger the
2 construction and completion dates of the AOP lines in multiple phases between 2031
3 and 2033.⁷ The process to build a complex transmission project such as AOP includes
4 several steps including, but not limited to: (i) getting TLSA approval; (ii) obtaining
5 materials which include items that require long lead times; (iii) obtaining necessary
6 right-of-way and permits; and (iv) constructing the line itself, including right-of-way
7 clearing, and civil and right-of-way improvements (*i.e.*, new roads and pads for
8 transmission structures). Furthermore, Florida's history of extreme weather (*i.e.*,
9 hurricanes) could result in delays if the project was unwisely built as a single phase in
10 2033 (rather than multiple phases as proposed).

11

12 Waiting until the FERC Order 1920 regional study is completed in January 2031 is
13 simply not feasible and would put FPL's customers and entire electric grid at risk.
14 Failure to complete the AOP by the 2033 in-service date would result in the existing
15 transmission system being unable to maintain reliable operations in the Miami-Dade
16 County area without involuntary load shedding of a significant number of customers as
17 detailed in Exhibit MAY-5.

⁷ In addition to the transmission needs identified by 2033, the phased approach for AOP will address a transmission line in Miami-Dade County which is projected to reach approximately 99 percent of its ampacity rating under certain NERC Reliability Standard TPL-001-5.1 contingency conditions by 2031. This information was previously provided in the Confidential attachment to Staff's First Set of Interrogatories, No. 2

1 **Q. In your opinion as an engineer and transmission planner, is it appropriate to delay**
2 **a needed transmission project based on speculative future alternatives as**
3 **proposed by EDF?**

4 A. No. Such a delay based on speculative future alternatives would put the reliable and
5 cost-effective electric service for FPL customers at substantial risk. FPL would and
6 could not support such hypothetical future projects that may or may not materialize.

7 **Q. Could the AOP Project be replaced by a regional transmission project as implied**
8 **in EDF witness Cranston’s testimony?**

9 A. No. The suggestion that the AOP could be replaced by a regional transmission project
10 reflects a fundamental misunderstanding of Florida’s transmission topology and the
11 applicable regional planning criteria under the current FERC Order 1000 process. The
12 undisputed transmission need is in Miami-Dade County, which is located at the
13 southernmost end of FPL’s service territory and is geographically constrained by the
14 Everglades to the west and the Atlantic Ocean to the east, leaving its electrical
15 interconnection limited to northward ties into Broward County.

16
17 Under the FERC Order 1000 regional planning framework, a project is considered
18 regional only if it provides benefits to two or more transmission providers. Florida has
19 three FERC-jurisdictional transmission providers: FPL, Duke Energy Florida (“DEF”),
20 and Tampa Electric Company (“TECO”), and satisfying regional criteria for
21 Miami-Dade County would require new transmission extending from Miami to central
22 or west Florida into the service territory of DEF or TECO, a distance exceeding 250
23 miles per line. Furthermore, to transfer the magnitude of power needed, such facilities

1 would necessarily be constructed at the 500 kV voltage level, with at least two 500 kV
2 lines required, resulting in a project involving a minimum of approximately 500 miles
3 of new 500 kV transmission. TECO does not own 500 kV facilities, and DEF's 500
4 kV system is much further north.

5
6 This scale, scope, cost, and geographic reach of such regional transmission solutions
7 underscore why AOP is appropriately planned as a local reliability project rather than
8 a regional transmission solution, and it is the most cost-effective solution for FPL
9 customers.

10

11

IV. Alternative Solutions

12

**Q. Did the EDF witness identify any alternative projects to address the identified
13 reliability need?**

14

A. No. The EDF witnesses do not identify any specific alternative project, proposed
15 configuration, expected in-service date, or other evidence that an alternative would
16 address the identified reliability need within the required timeframe in 2033.

17

**Q. Do you agree with EDF witness Cranston that FPL was required to develop
18 "alternative solutions" rather than alternative routes?**

19

A. No. While I am not an attorney, it is my understanding that per Rule 25-22.076(4),
20 Florida Administrative Code, FPL is supposed to consider and describe the "*major*
21 *alternative transmission lines or transmission improvements*" or "*other transmission*
22 *line alternatives.*" The term "alternative solutions" does not appear in the
23 Commission's rule here. Pages 13-15 of my direct testimony detail the two

1 transmission alternatives to the proposed AOP project. Ultimately, the AOP is the most
2 cost-effective alternative, taking into account the demand for electricity, maintaining
3 transmission reliability and integrity, and addressing the need for abundant, low-cost
4 electrical energy to assure the economic well-being of the residents of this state.

5 **Q. Do you agree with EDF witness Cranston that FPL did not consider alternatives**
6 **such as (a) incremental generation or (b) the utilization of transmission**
7 **technologies for Miami-Dade County?**

8 A. No. FPL conceptually considered whether new generation resources located within
9 the impacted area could address the identified transmission system conditions. The
10 Company determined that incremental gas-fired generation was not a feasible
11 alternative due to existing natural gas deliverability constraints in the Miami-Dade
12 County area. FPL further expanded on why incremental generation or energy storage
13 was not feasible for Miami-Dade County in Exhibit MAY-6.

14

15 Further, FPL considers multiple transmission technologies, including but not limited to
16 Advanced Transmission Technologies (“ATT”) and Grid-Enhancing Technologies
17 (“GETs”) as part of the design and engineering of major transmission projects,
18 including the AOP Project:

19 • **Advanced Transmission Conductors** - FPL is utilizing advanced
20 transmission conductors on both of the 230 kV lines for AOP Project. This
21 aluminum conductor steel supported (“ACSS”) transmission conductor has
22 similar ampacity as a composite based transmission conductor (another type of
23 advanced conductor), but ACSS is more cost effective for this project.

- 1 • **Topology Optimization** - FPL’s transmission planning and operations teams
2 already employ transmission topology optimization for planning and
3 operations via switching solutions to mitigate overloads.
- 4 • **Synchronous Condensers** - FPL previously converted old steam units into
5 synchronous condensers (commonly considered a type of GET) at FPL’s
6 Turkey Point facility, which provides needed voltage support for Miami-Dade
7 County.
- 8 • **Ambient Adjusted Ratings (AAR) & Dynamic Line Ratings (DLRs)** -
9 Effective April 1, 2026, FPL is implementing AAR pursuant to FERC Order
10 881. While FPL is not utilizing DLRs for its system, AAR utilizes actual
11 weather data to accurately establish transmission line ratings, replacing
12 static/seasonal assumptions – providing more accurate near-term thermal
13 ratings to better maximize the utilization of existing transmission assets. FPL
14 lines, including the AOP, will use AAR for temperature-adjusted ratings. The
15 temperature data is retrieved every five minutes, and AAR are recalculated at
16 a minimum hourly or every five degrees change in temperature. The AAR
17 calculations are based on discrete ambient temperatures inputs of no more than
18 five degrees Fahrenheit as well as incorporating the impact of solar heating
19 effects during daytime conditions (excluded during nighttime conditions).
- 20 • **Advanced Transmission Control Devices and other transmission**
21 **technologies** – FPL’s transmission toolkit includes other transmission
22 technologies such as series compensation, static VAR compensators (“SVC”),
23 enhanced real-time grid monitoring, and grid-forming inverters which are

1 but also considered and implemented transmission technologies with the goal of
2 maximizing capacity and reliability on its transmission system. The Raven-Sinai
3 Transmission Line (also known as NFRC) was discussed extensively during FPL's
4 2021 Rate Case in Docket No. 20210015-EI and was ultimately approved. Today, the
5 Raven-Sinai Transmission Line successfully connects FPL customers in Peninsular
6 Florida to those in Northwest Florida (formerly Gulf Power) allowing for economic
7 power transfer between the two areas.

8 **Q. How should reliability considerations factor into the Commission's analysis of**
9 **customer impacts?**

10 A. Maintaining system reliability is essential to protecting customers from outages, load
11 shed, and associated economic harm. Investments that prevent reliability failures at the
12 lowest cost that are reasonably feasible directly benefit customers and are consistent
13 with providing abundant, low-cost electric energy.

14

15

VI. CONCLUSION

16 **Q. What is your overall conclusion regarding the EDF testimonies of witnesses**
17 **Thomas and Cranston?**

18 A. The testimonies of EDF's witnesses fail to provide any technical analysis of or
19 otherwise contest the need for the AOP supported by FPL's 2025 transmission
20 assessment technical analyses based on mandatory NERC reliability standards. EDF's
21 arguments rely on generalized federal policy concerns and speculative future planning
22 concepts and processes rather than evidence relevant to and presented in this

1 proceeding. The Commission should therefore approve the Project as necessary to
2 ensure reliable electric service and low-cost energy for the benefit of FPL's customers.

3 **Q. Does this conclude your rebuttal testimony?**

4 **A. Yes.**

1 BY MR. COX:

2 Q Mr. Yanes, did you also have Exhibits MAY-5
3 and MAY-6 attached to your rebuttal testimony?

4 A Yes.

5 Q Do you have any changes or corrections to
6 those rebuttal testimony exhibits?

7 A No.

8 MR. COX: Commissioners, those Exhibits MAY-5
9 and MAY-6 have been marked as hearing exhibits on
10 the staff's comprehensive exhibit list, and they
11 are hearing Exhibits 35 and 36.

12 CHAIRMAN CLARK: Noted.

13 BY MR. COX:

14 Q Mr. Yanes, have you prepared a summary of your
15 prefiled rebuttal testimony?

16 A Yes.

17 Q Could you please present that summary to the
18 Commission at this time?

19 A Yes.

20 Good morning again, Commissioners. My
21 rebuttal testimony addresses arguments raised by the
22 Environmental Defense Fund witness Ted J. Thomas and
23 David Cranston opposing the AOP.

24 EDF does not dispute the need for this
25 project. Their witnesses present no transmission

1 studies or reliability analysis challenging FPL's
2 finding that, in 2033, Miami-Dade County will experience
3 NERC reliability standard violations without new
4 transmission facilities.

5 Instead, EDF relies on speculative federal
6 policy decisions and future regional transmission
7 process -- planning process that does not -- has not
8 been approved and does not exist.

9 EDF attempts to use a statewide production
10 cost model that is not appropriate for Florida. We are
11 a vertically integrated utilities, which independently
12 plan generation that must meet FPSC mandated reserve
13 margins.

14 EDF offers ideas of potential regional
15 transmission projects based on a commission report and
16 faulty analysis with a deficient production cost -- with
17 a deficient production cost model. This analysis uses
18 an incomplete reflection of FPL's transmission system
19 and assumed data fails to analyze the electric
20 infrastructure within the affected counties.

21 The AOP, it's a local project designed to
22 address a local need identified under NERC reliability
23 in Miami-Dade County, and it is the most cost-effective
24 transmission alternative. FPL evaluated other
25 alternatives, including advanced transmission

1 technologies and generation-based solutions, but none
2 could reliably or feasible address the need.

3 In summary, the record supports the approval
4 of AOP as necessary to maintain reliable electric
5 service with low-cost energy for the customers in
6 Miami-Dade Counties.

7 Thank you.

8 **Q Thank you, Mr. Yanes.**

9 MR. COX: Commissioners, Commissioner Clark,
10 Mr. Yanes is available for your questions.

11 CHAIRMAN CLARK: Any questions for Mr. Yanes?
12 No questions.

13 MR. COX: Thank you.

14 At this time, FPL would move the exhibits
15 marked as hearing Exhibit Nos. 35 and 36 into the
16 record.

17 CHAIRMAN CLARK: Without objection, so
18 ordered.

19 (Whereupon, Exhibit Nos. 35-36 were received
20 into evidence.)

21 MR. COX: Thank you, Commissioner Clark.
22 May the witness be excused?

23 CHAIRMAN CLARK: The witness is excused.

24 Thank you, Mr. Yanes.

25 THE WITNESS: Thank you.

1 MR. COX: Thank you.

2 (Witness excused.)

3 CHAIRMAN CLARK: All right. Unless I am
4 missing something, that concludes all of our
5 witness testimony. Is that a fair statement?

6 MR. SCHEF WRIGHT: Yes, sir.

7 MR. COX: Yes.

8 CHAIRMAN CLARK: All right. Thank you for
9 your efficiency.

10 All right. Staff, any other matters that need
11 to be addressed today?

12 MR. MARQUEZ: Yes, Commissioner. The parties
13 have expressed a desire to file post-hearing briefs
14 in this case. Staff notes that post-hearing briefs
15 are due April 29th, and shall not exceed 75 pages,
16 as described in the Prehearing Order.

17 CHAIRMAN CLARK: All right. All in
18 agreements?

19 MR. SCHEF WRIGHT: Yes, sir.

20 MR. COX: Yes.

21 CHAIRMAN CLARK: All right. Commissioner Art
22 Graham is having backflips of 75-page post-hearing
23 briefs.

24 All right. Any additional matters from any of
25 the parties before we adjourn?

1 MR. SCHEF WRIGHT: No, sir. Thank you.

2 MR. COX: Nothing from FPL. Thank you.

3 CHAIRMAN CLARK: All right. Seeing none, this
4 hearing is adjourned. Thank you.

5 MR. SCHEF WRIGHT: Thank you.

6 (Proceedings concluded.)

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CERTIFICATE OF REPORTER


STATE OF FLORIDA)
COUNTY OF LEON)

I, DEBRA KRICK, Court Reporter, do hereby certify that the foregoing proceeding was heard at the time and place herein stated.

IT IS FURTHER CERTIFIED that I stenographically reported the said proceedings; that the same has been transcribed under my direct supervision; and that this transcript constitutes a true transcription of my notes of said proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 23rd day of April, 2026.


DEBRA R. KRICK
NOTARY PUBLIC
COMMISSION #HH575054
EXPIRES AUGUST 13, 2028