

3. Lack of evidence for need from Sabal Trail

FERC said when it opened the comment period on Sabal Trail's request for a six-month extension,²⁴ that the Commission would not entertain discussions on need. However, Sabal Trail reopened that discussion in its Answer of June 8, 2020.²⁵ Also note that since FERC has declared that comment process moot,²⁶ apparently FERC's attempted prohibition on discussing need is also moot. FERC has not explicitly addressed Sabal Trail's motion for leave to answer nor Sabal Trail's Answer, so apparently that Answer was admitted to the record.

Meanwhile, the collapse in Liquid Natural Gas (LNG) prices and the bankruptcies of major shale gas drillers and the exponential increase in wind and solar power capacity each are novel and significant circumstances that question any need for Sabal Trail.

Sabal Trail has provided no evidence for its alleged need for its Phase II gas other than that Florida Power and Light ("FPL") has signed up as a customer. Since FPL's parent NextEra Energy ("NextEra") is a partner in Sabal Trail, more evidence than self-dealing is needed. In fact, numerous statements of FPL and Sabal Trail partners Duke Energy and NextEra Energy assert that solar and wind are what are needed, not gas pipelines.

4. FPL's evidence of need for renewables, not fossil fuels

FPL's Ten Year Power Plant Site Plan, 2020 – 2029,²⁷ in Schedule 3.1: FPL History of Summer Peak Demand (MW), shows very little increase in summer peak demand.

Instead, that Plan shows decreases in Net Firm Demand in 2017 and 2018, and only a 4.8% increase in 2019, with a decade-long average of only about 1% annual increase.

Sabal Trail did not mention winter demand, and that's no wonder. Schedule 3.2: FPL History of Winter Peak Demand (MW) shows a clear trend of *decreased* Net Firm Demand for the past decade.

Further, Schedule 3.3: FPL History of Annual Net Energy for Load (GWh), shows less than 1% average annual increase in Actual Total Retail Sales (GWh) Load.

FPL's Ten Year Plan only mentions Sabal Trail twice, on pages 89 and 143.

On page 89 that Plan says:

"Natural gas sourcing and delivery: In 2013, the FPSC approved FPL's contracts to bring more natural gas into FPL's service territory through a third natural gas pipeline system into Florida. The process by the pipeline companies to obtain approval from the Federal Energy Regulatory Commission (FERC) for the new pipeline system, consisting of the Sabal Trail and Florida Southeast Connection pipelines, culminated in receiving a FERC certificate of approval on February 2, 2016. The new pipeline system has been constructed and is now in

²⁴ "Notice of Extension of Time Request re Sabal Trail Transmission, LLC under CP15-17," FERC, March 27, 2020, [FERC Accession Number 20200327-3095](#)

²⁵ "Motion for Leave to Answer and Answer of Sabal Trail Transmission, LLC under CP15-17, et al." Sabal Trail, June 8, 2020, [FERC Accession Number 20200608-5183](#).

²⁶ "Notice Dismissing Request for Extension of Time As Moot re Sabal Trail Transmission, LLC under CP15-17." FERC, May 1, 2020, [FERC Accession Number 20200501-3043](#).

²⁷ "Ten Year Power Plant Site Plan 2020-2029," FPL, April 2020, <https://www.fpl.com/about/10-year-site-plan.html>