

*service. This pipeline is necessary to fuel the FPSC-approved Okeechobee CC unit. The new pipeline system utilizes an independent route that will result in a more reliable, economic, and diverse natural gas supply for FPL customers and the State of Florida.”*

On Page 143 that Plan says:

*“FPL has historically purchased the gas transportation capacity required for new natural gas supply from two existing natural gas pipeline companies: FGT and Gulfstream. In mid-2017, a third new pipeline system, consisting of the Sabal Trail and Florida Southeast Connection pipelines, went into operation. This new pipeline system is now providing fuel for FPL’s Riviera and Martin plants. The new pipeline system also provides the primary fuel for the recently added Okeechobee CC unit. The new pipeline system will also allow needed support for gas-fueled FPL generation facilities in several counties.”*

Yet in the previous paragraph that Plan says:

*“Significant reliance upon natural gas to produce electricity for FPL’s customers is projected to continue over the long-term due to FPL’s growing load. The addition of highly fuel-efficient CC units at Cape Canaveral, Riviera Beach, Port Everglades, and Okeechobee, plus the additional CC capacity at the Dania Beach site that will come in-service in 2022, will reduce the growth in natural gas use from what it otherwise might have been due to the high fuel-efficiency levels of these new CC units. In addition, as discussed above, FPL currently plans to add significantly more solar PV facilities that utilize no fossil fuel.”*

Even FPL admits it plans to *“reduce the growth in natural gas use from what it otherwise might have been.”* Building still more fossil-fuel-burning natural gas power plants is not a good way to do that.

FPL admits there is a better way, *“to add significantly more solar PV facilities that utilize no fossil fuel.”* FPL is making quite a bit of progress in solar power, with numerous 74.5 MW solar installations in numerous counties throughout Florida. See Schedule 8, Planned And Prospective Generating Facility Additions And Changes.

The sheer geographical distribution of those solar installations glaringly exposes the weakness of one of FPL’s three original and continued excuses for Sabal Trail: *“The new pipeline system utilizes an independent route that will result in a more reliable, economic, and diverse natural gas supply for FPL customers and the State of Florida.”* No pipeline can have as independent a route as distributed solar power production, and Sabal Trail certainly does not. Far from being more reliable, a massive interstate pipeline is a hundreds-of-miles-long line of potential failure, which if it breaks at any point shuts off all power from it. Meanwhile, if one set of solar panels is shaded or otherwise diminished, others continue.

What FPL customers need is electricity, not natural gas. Solar power is less expensive, faster to deploy, burns no fossil fuels, uses no cooling water, and emits no pollutants. In the years FPL wasted in the Sabal Trail permitting process, FPL could have already built enough solar installations to provide more electricity than Sabal Trail ever will.

Thus FPL’s Ten Year Plan does not support Sabal Trail’s assertion of need for additional