

gas to meet summer demand, nor for that matter, to meet any increased demand. Additional gas would instead serve to subvert the significant progress FPL has made in load management and conservation; see Schedule 3.1. Additional gas would also serve to subvert the significant progress FPL (and its parent NextEra Energy) has made in deploying solar power.

Even FPL, in its Schedule 6.1 Forecasted, projects decreased use of natural gas over the decade through 2029 while solar power will increase by five or six times. Natural gas is not a bridge fuel. It is an impediment to getting on with the solar future now.

FPL and Sabal Trail do not appear to be on the same page. FPL has for more than a year been publicising its shift to clean energy, as for example in March 2019: **“FPL announces plan to build the world's largest solar-powered battery and drive accelerated retirement of fossil fuel generation,”**²⁸

- Innovative modernization plan will replace a pair of aging natural gas power generating units with clean and renewable energy, saving FPL customers more than \$100 million while eliminating more than 1 million tons of carbon dioxide emissions

- The FPL Manatee Energy Storage Center's battery system is projected to have four times the capacity of the world's largest battery system currently in operation

- Charged by an existing, co-located FPL solar power plant, the planned battery storage center will increase the predictability of solar - extending its benefits even when the sun is not shining

JUNO BEACH, Fla., March 28, 2019 / [PRNewswire](#)/ -- Florida Power & Light Company, one of the nation's cleanest energy companies, today announced a plan to build the world's largest solar-powered battery system – four times the capacity of the largest battery system in operation – as part of an innovative modernization plan that will accelerate the retirement of two fossil fuel generation units.

FPL’s move to renewable energy and away from fossil fuels is a novel and significant circumstance that should be considered in a new SEIS.

5. Duke’s evidence of need for renewables, not fossil fuels

Sabal Trail’s other big customer, Duke Energy, after the cancellation of ACP, also emphasized renewable energy and battery storage:

"Sustainability and the reduction of carbon emissions are closely tied to our region's success," said Lynn Good, Duke Energy Chair, President and CEO. "In our recent Climate Report, we shared a vision of a cleaner energy future with an increasing focus on renewables and battery storage in addition to a diverse mix of zero-carbon nuclear, natural gas, hydro and energy efficiency programs.

"Achieving this clean energy vision will require all of us working together to develop a plan that is smart, equitable and ensures the reliability and

²⁸ “FPL announces plan to build the world's largest solar-powered battery and drive accelerated retirement of fossil fuel generation,” FPL, March 8, 2019, <http://newsroom.fpl.com/2019-03-28-FPL-announces-plan-to-build-the-worlds-largest-solar-powered-battery-and-drive-accelerated-retirement-of-fossil-fuel-generation>