

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric
Conservation goals (Duke Energy
Florida, Inc.)

Docket No. 130200-EI
Filed: April 28, 2014

**DUKE ENERGY FLORIDA'S RESPONSE TO PETITION TO INTERVENE BY
THE ENVIRONMENTAL DEFENSE FUND**

Duke Energy Florida, Inc. ("DEF"), hereby responds to the Petition to Intervene by the Environmental Defense Fund ("EDF") filed in this docket on April 22, 2014. At this time, DEF does not object to EDF's intervention as a representative organization on behalf of its members to advocate on the energy conservation and renewable energy issues in this docket. However, DEF does not agree with or concede any of the facts alleged in EDF's Petition, including any allegations of standing.

Specifically, EDF alleges that it has 16,421 members in Florida, but does not allege that any of its members are DEF's customers. Because it stands to reason that some of its members are in fact DEF's customers, while reserving its right to challenge as facts become known, at this time DEF does not contest EDF's standing on this point. EDF's Petition also includes allegations and discussion related to total customer energy prices, *see, e.g.*, Petition at ¶¶ 7 & 8, and DEF reserves its right to challenge EDF's standing to offer such arguments. EDF has the ultimate obligation to prove facts necessary to establish its standing to participate in this docket or in parts thereof.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on the following via electronic mail this 28th day of April, 2013.

/s/ Matthew R. Bernier

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