

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for)
Seminole combined cycle facility, by) DOCKET NO. 20170266-EC
Seminole Electric Cooperative, Inc.)
)

In re: Joint petition for determination)
of need for Shady Hills combined cycle) DOCKET No. 20170267-EC
facility in Pasco County, by Seminole)
Electric Cooperative, Inc. and Shady) FILED: January 17, 2018
Hills Energy Center, LLC.)
)

MOTION TO INTERVENE OF QUANTUM PASCO POWER, L.P.

Quantum Pasco Power, L.P. ("Quantum"), pursuant to Chapters 120, 366, and 403, Florida Statutes,¹ and Rules 28-106.204 and 28-106.205, Florida Administrative Code ("F.A.C."), hereby respectfully moves to intervene in the above-styled dockets.

In summary, Quantum is the owner of the Pasco Power Plant, a dual-fueled combined cycle electrical power plant located in Dade City, Florida (the "Pasco Facility"), and Quantum submitted proposals in response to Seminole Electric Cooperative, Inc.'s ("Seminole") March 1, 2016 Request for Proposals ("RFP") process in which Seminole sought up to 1000 MW of firm capacity. Consistent with applicable Florida Public Service Commission (the "Commission") precedent, with the policy purposes underlying Commission Rule 25-22.082(16), F.A.C., with the Commission's express jurisdiction to prevent the uneconomic duplication of generation facilities within the Florida grid, with the public

¹All references herein to the Florida Statutes are to the 2017 edition thereof.

interest in having the electrical needs of Seminole's member cooperatives, and these cooperatives' members-consumers who receive retail electric service from Seminole's members, served in the most cost-effective way possible, and with the need determination criteria of Section 403.519, Florida Statutes, Quantum is entitled to intervene in this proceeding because the Commission's decision herein will determine Quantum's substantial interests in pursuing its business of operating the Pasco Power Plant and supplying cost-effective power to the utilities operating in the Florida electric power grid, including supplying power to Seminole for the benefit of Seminole, its member cooperatives, and the member-consumers who receive retail electric service from Seminole's Members. At this juncture, without having been able to see the redacted exhibits in either of the two consolidated dockets, Quantum respectfully seeks to intervene in both dockets, given that the interrelationships of the two proposed power plants may influence and affect analyses of need and cost-effectiveness in each docket.

In further support of its motion to intervene, Quantum states as follows.

PROCEDURAL BACKGROUND

1. The name, address, and telephone number of the movant are as follows:

Quantum Pasco Power, L.P.
14850 Old State Road 23
Dade City, Florida 33523

Telephone (352) 523-0062.

2. All pleadings, orders and correspondence should be directed to Quantum's representatives as follows:

Robert Scheffel Wright
John T. LaVia, III
Gardner, Bist, Bowden, Bush, Dee, LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
Telephone (850) 385-0070
Facsimile (850) 385-5416

with a courtesy copy to:

James Maiz, President
Quantum Pasco Power, L.P.
24 Waterway Avenue
Suite 800
The Woodlands, Texas 77002
(281) 863-9006 Office
(281) 863-9056 Fax.

3. The agency affected by this motion to intervene is:

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850.

4. Commission Docket No. 20170266-EC² was initiated by Seminole's filing of its "Petition for Determination of Need for Seminole Combined Cycle Facility" (the "Seminole Facility Petition") on December 21, 2017. Commission Docket No. 20170267-EC was initiated by the filing, also on December 21, 2017, of the "Joint Petition for Determination of Need for Shady Hills Combined Cycle Facility" (the "Shady Hills Petition") by Seminole and Shady Hills Energy Center, LLC ("Shady Hills LLC"). The

² By order dated January 5, 2018, the Commission consolidated Docket No. 20170267-EC with Docket No. 20170266-EC.

final hearing in these consolidated proceedings is scheduled for March 21-22, 2018, and therefore, pursuant to Rule 28-106.205(1), F.A.C., this motion to intervene is timely filed.

FACTUAL BACKGROUND

5. Quantum Pasco Power, L.P., is a Florida limited partnership. Quantum is the owner of the Pasco Power Plant, a dual-fueled combined cycle generating plant located in Dade City, Florida.

6. Seminole is a not-for-profit rural electric cooperative organized under Chapter 425, Florida Statutes. Seminole has nine member cooperatives ("Members"):

- Central Florida Electric Cooperative, Inc.;
- Clay Electric Cooperative, Inc.;
- Glades Electric Cooperative, Inc.;
- SECO Energy;
- Suwannee Valley Electrical Cooperative, Inc.;
- Talquin Electric Cooperative, Inc.;
- Tri-County Electric Cooperative, Inc.; and
- Withlacoochee River Electric Cooperative, Inc.

Seminole's Members are distribution cooperatives serving retail member-consumers ("Member-Consumers"). Seminole's principal business purpose is to provide reliable power at the lowest feasible cost to its distribution Members' systems, which it fulfills by supplying requirements power to each of its Members

under the terms of long-term wholesale power contracts.

7. The Pasco Facility consists of two dual-fueled 48.5 megawatt ("MW") General Electric LM6000 PC aero-derivative combustion turbine generators with heat recovery steam generation, operated in combined cycle with a 26.5 MW General Electric condensing steam turbine generator. In 2006, both gas turbines were upgraded to increase the Facility's efficiency to a nominal 121 MW (124 MW under winter ambient conditions and 121 MW under summer ambient conditions). The Pasco Facility's primary fuel is natural gas, which it receives at its gas yard via Peoples Gas System ("PGS") at the Lakeland North meter. PGS connects to the Florida Gas Transmission ("FGT") pipeline. The Pasco Facility's secondary fuel is fuel oil #2, ultra-low sulfur diesel which is stored on-site in a 170,000-gallon storage tank. The Pasco Facility is located in Tampa Electric Company's ("TECO") service territory and is connected to TECO's transmission system via a 72 kV transmission line at the Union Hall Substation. The Pasco Facility achieved commercial operation in 1993 and has a proven track record of reliable operation since then. Since 1993, the Pasco Facility has supplied more than 11 million MWh of wholesale power to a number of Florida utilities, including Duke Energy Florida (and its predecessors) and Tampa Electric Company, with an equivalent forced outage rate of 1.86 percent.

8. Quantum participated in Seminole's RFP dated March 1, 2016, in which Seminole sought proposals to meet its projected needs for capacity of 600 MW by June 2021, increasing to 1,000 MW of need by June 2022.³ Quantum timely submitted its proposals on March 1, 2016, and provided supplemental and updated information to Seminole on May 7, 2016 and October 11, 2016. Quantum's proposals included multiple options for tolling agreements for 100% of the Pasco Facility's output and the outright purchase by Seminole of the Pasco Facility. Quantum was not selected by Seminole as a winning bidder.

9. In the Petitions, Seminole indicates that it proposes to meet its capacity needs through a combination of generating resources including the proposed Shady Hills Combined Cycle Facility (the "Shady Hills Facility"), which is proposed to be a 573 MW (winter) natural gas-fired, combined cycle facility, the output of which would be available to Seminole pursuant to a tolling agreement (the "Tolling Agreement") that would support construction of the Shady Hills Facility; and construction by Seminole of the proposed Seminole Combined Cycle Facility (the "Seminole Facility"), a 1,183 MW (nominal capacity when firing natural gas) two-on-one combined cycle generating facility; and removal from service of one of Seminole's existing 664 MW coal-

³ In Seminole's Petition, Seminole now asserts a projected a need for 901 MW of additional capacity by the end of 2021, increasing to a projected need of 1,265 MW of additional capacity by the end of 2022.

fired units. (Collectively, these projects will be referred to as "Seminole's Proposed Resource Plan.")

10. In the Petitions, Seminole states that it considered various risks in its analyses of alternatives. Quantum asserts that an accurate analysis of the applicable and relevant risk factors will demonstrate that all of these factors show that the Pasco Power Plant compares favorably to the Shady Hills Facility. For example, the Pasco Facility is built, and pricing - whether under a tolling agreement or via an asset purchase - for the Pasco Power Plant will be 100 percent certain, so the construction cost risk is zero.

STATEMENT OF AFFECTED INTERESTS

11. In this docket, the Commission will decide whether to approve Seminole's Petition for determination that the proposed Shady Hills Facility represents the most cost-effective alternative to meet the needs of Seminole and its Members and their Member-Consumers. If the Commission grants Seminole's Petition, that decision will directly determine Quantum's substantial interests in that it will foreclose Quantum from meeting Seminole's identified need with power supplied from the existing Pasco Facility. In short, such a decision would directly and adversely affect Quantum's interests in operating the Pasco Facility by foreclosing a business opportunity and by duplicating the capacity of the existing Pasco Facility, an

established, productive, useful, and reliable asset within the Florida bulk power supply grid. If Quantum is not able to enter into a feasible power supply contract or asset sale arrangement (or both) with a viable counter-party, it is virtually certain that Quantum will have only one economically rational choice, namely to close the Pasco Facility and attempt to use its components elsewhere in order to minimize further losses. At this point in time, Seminole is the only realistic potential counter-party, such that it is highly likely that, absent a reasonable business agreement with Seminole, the Pasco Facility will be removed from service in the Florida grid.

12. Quantum's substantial interests are of sufficient immediacy to entitle it to participate in the proceeding and are the type of interests that the proceeding is designed to protect. To participate as a party in this proceeding, an intervenor must demonstrate that its substantial interests will be affected by the proceeding. Specifically, the intervenor must demonstrate that it will suffer a sufficiently immediate injury in fact that is of the type the proceeding is designed to protect. Ameristeel Corp. v. Clark, 691 So. 2d 473 (Fla. 1997); Agrico Chemical Co. v. Department of Environmental Regulation, 406 So. 2d 478 (Fla. 2d DCA 1981), rev. denied, 415 So. 2d 1359 (Fla. 1982). Here, the outcome of this proceeding will immediately determine Quantum's substantial interests in providing economic electric

capacity and energy to Seminole, without the impairment of having Quantum's existing Pasco Facility being uneconomically duplicated by the Shady Hills Facility. Quantum's interests will be determined, with finality, by the Commission's decision on Seminole's Petition for determination that Seminole's Proposed Tolling Agreement supporting construction of the Shady Hills Facility to meet its capacity needs is the most cost-effective alternative for meeting those needs. Quantum contends that it can and will meet the needs of Seminole's Members and their Member-Consumers more cost-effectively than Seminole's Proposed Tolling Agreement supporting construction of the Shady Hills Facility; if the Commission were to approve Seminole's proposal, Quantum would be foreclosed from supplying power to meet the needs of Seminole's Members and their Member-Consumers. Moreover, as an established power supplier within the Florida grid, Quantum's substantial interests (as well as the public interest) in avoiding the "uneconomic duplication of generation . . . facilities" that is contrary to the State's policy and strongly discouraged, if not outright proscribed, by Section 366.04(5), Florida Statutes, would also be adversely affected.

13. Although Seminole is not subject to the Commission's "Bid Rule" (Rule 25-22.082, F.A.C.), Seminole issued a competitive RFP and the same public policy reasons for granting standing to competitors in RFPs conducted pursuant to the

Commission's Bid Rule exist here. Indeed, Seminole effectively alleged that it followed the precepts and principles of the Bid Rule in describing its procurement/RFP process in its Petition in the Shady Hills Need Docket.⁴ Those purposes are to protect end use electric consumers, including the Member-Consumers of Seminole's Member cooperatives, by ensuring that viable competitors can formally challenge and test a utility's selection of a self-build option in the subsequent need determination proceedings. Quantum was and is a viable competitor to supply Seminole's needs.

14. The Commission should note well its precedent that it granted standing to competitors in at least one need determination case before it promulgated the Bid Rule. In 1992, the Commission was presented with a need petition for a power plant by Florida Power & Light Company ("FPL"). Two competitors, the ARK/CSW Development Partnership and Nassau Power Corporation, offered competing alternatives to FPL in the need case, but FPL challenged their standing to intervene. In re: Joint Petition to Determine Need for Electric Power Plant to be Located in Okeechobee County by Florida Power & Light Company and Cypress Energy Partners, Limited Partnership, Docket No. 920520-EQ, Order No. PSC-92-1355-FOF-EQ at 3-4 (November 23, 1992) ("Cypress Energy Partners"). The Commission granted both ARK/CSW and

⁴Seminole's Petitions incorrectly identified the Bid Rule as Rule 25-17.082, F.A.C.

Nassau Power standing over FPL's objections, stating as follows:

We have recognized that it is incumbent upon competing alternatives to come forward at a need determination to demonstrate that the applicant's project is not the most cost-effective alternative. (citation omitted) There is a limited need for additional capacity and energy in the state of Florida. If a need for the Cypress project was determined by this Commission, Nassau and Ark/CSW would not be able to construct their proposed projects to fill FPL's capacity and energy needs in 1998-1999. We believe that Nassau and Ark/CSW have established that their substantial interests are adversely affected by this proceeding.

As noted above, the Commission's order granting standing to ARK/CSW and Nassau Power was issued on November 23, 1992. The Bid Rule was not promulgated until January 10, 1994.

15. The substance and policy considerations are no different in this case than those in the 1992 case, and even if the Bid Rule does not technically apply to Seminole, the statutory provisions under which the Commission is to evaluate Seminole's Petitions here are identical to those pursuant to which the Commission granted intervention to ARK/CSW and Nassau Power in 1992. Quantum is a viable competitor whose substantial interests will be determined by the Commission's decision here in exactly the same way that ARK/CSW's and Nassau Power's interests would have been determined in 1992.

16. Moreover, Quantum's substantial interests will be affected in an additional way. Because the Pasco Facility is an existing, reliable, and productive generating asset that has well

served Florida electric utilities and their customers for nearly twenty-five years, Quantum has a substantial interest in having the Commission enforce its jurisdiction under Section 366.04(5), Florida Statutes, to avoid "the further uneconomic duplication of generation . . . facilities" in Florida. Quantum has offered to provide Seminole with 121 MW of capacity from the Pasco Facility, capacity that will be available for Seminole's Members and their Member-Consumers year-round. Instead of accepting Quantum's offer, however, Seminole has joined with Shady Hills in proposing that the Shady Hills Facility be constructed, with Seminole asserting that it will purchase (or at least have the right to schedule and purchase) the output of the Shady Hills Facility pursuant to the Tolling Agreement to meet its needs. The construction of the Shady Hills Facility is clearly duplicative of the existing Pasco Facility (and probably of other generating assets in the Florida bulk power grid), and Quantum contends that its proposal to Seminole is cost-effective as compared to Seminole's proposal, which would mean that Seminole's Shady Hills proposal is uneconomically duplicative, assuming Quantum's contentions to be true.⁵ As an owner and operator of an existing facility that has operated reliably in the Florida bulk power grid for nearly 25 years, Quantum is entitled to standing in these proceedings to vindicate its interests in being protected

⁵ Of course, in evaluating a party's standing, the Commission must assume all facts alleged by the party to be true.

against the uneconomic duplication of its Pasco Facility.

DISPUTED ISSUES OF MATERIAL FACT

17. In its Petition, Seminole does not identify any disputed issues of material fact. Quantum proposes the following issues for this proceeding which closely track the issues included in the Order Establishing Procedure:

Issue 1A: Is there a need for the proposed Seminole Combined Cycle Facility, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519(3), Florida Statutes?

Issue 1B: Is there a need for the proposed Shady Hills Combined Cycle Facility, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519(3), Florida Statutes?

Issue 2A: Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Seminole Electric Cooperative, Inc., which might mitigate the need for the proposed Seminole Combined Cycle Facility?

Issue 2B: Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Seminole Electric Cooperative, Inc. and Shady Hills Energy Center, LLC, which might mitigate the need for the proposed Shady Hills Combined Cycle Facility?

Issue 3A: Is there a need for the proposed Seminole Combined Cycle Facility, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519(3), Florida Statutes?

Issue 3B: Is there a need for the proposed Shady Hills Combined Cycle Facility, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519(3), Florida Statutes?

Issue 4A: Is there a need for the proposed Seminole Combined Cycle Facility, taking into account the need for fuel diversity and supply reliability, as this criterion is used in Section 403.519(3), Florida Statutes?

Issue 4B: Is there a need for the proposed Shady Hills Combined Cycle Facility, taking into account the need for fuel diversity and supply reliability, as this criterion is used in Section 403.519(3), Florida Statutes?

Issue 5A: Will the proposed Seminole Combined Cycle Facility provide the most cost-effective alternative available, as this criterion is used in Section 403.519(3), Florida Statutes?

Issue 5B: Will the proposed Shady Hills Combined Cycle Facility provide the most cost-effective alternative available, as this criterion is used in Section 403.519(3), Florida Statutes?

Issue 6A: Will the construction and operation of the Seminole Combined Cycle Facility result in the uneconomic duplication of generation resources, as that term is used in Section 366.04(5), Florida Statutes?

Issue 6B: Will the construction and operation of the Shady Hills Combined Cycle Facility result in the uneconomic duplication of generation resources, as that term is used in Section 366.04(5), Florida Statutes?

Issue 7: Did Seminole Electric Cooperative accurately and appropriately evaluate all reasonable alternative scenarios for cost-effectively meeting the needs of its customers over the relevant planning horizon?

Issue 8: Did Seminole Electric Cooperative administer a transparent, robust, and constructive RFP evaluation process that was designed to evaluate a range of scenarios and sensitivities to procure the most cost-effective alternative generation supply addition for cost-effectively meeting the needs of its Members and their Member-Consumers?

Issue 9A: Seminole and Shady Hills have claimed that Seminole considered various risk factors in their analyses of alternative power supply resources through which Seminole selected the Seminole Facility and the Shady

Hills Facility. Does the Seminole Facility have a more or less favorable risk profile than other options, including the Pasco Facility, based on evaluation of the risk factors identified by Seminole?

Issue 9B: Seminole and Shady Hills have claimed that Seminole considered various risk factors in their analyses of alternative power supply resources through which Seminole selected the Seminole Facility and the Shady Hills Facility. Does the Shady Hills Facility have a more or less favorable risk profile than other options, including the Pasco Facility, based on evaluation of the risk factors identified by Seminole?

Issue 10A: Based on the resolution of the foregoing issues and other matters within its jurisdiction which it deems relevant, should the Commission grant Seminole Electric Cooperative, Inc.'s petition to determine the need for the proposed Seminole Combined Cycle Facility?

Issue 10B: Based on the resolution of the foregoing issues and other matters within its jurisdiction which it deems relevant, should the Commission grant Seminole Electric Cooperative, Inc. and Shady Hills Energy Center, LLC's joint petition to determine the need for the proposed Shady Hills Combined Cycle Facility?

Issue 11A: Should Docket No. 20170266-EC be closed?

Issue 11B: Should Docket No. 20170267-EC be closed?

Quantum reserves all rights to raise additional issues in accordance with the Commission's rules and the Order Establishing Procedure in this case. Repeating a point made at the outset of this motion, at this juncture, without having been able to see the redacted exhibits in either of the two consolidated dockets, Quantum respectfully seeks to intervene in - and to raise and address issues in - both dockets, given that the interrelationships of the two proposed power plants may influence

and affect analyses of need and cost-effectiveness in each docket.

STATEMENT OF ULTIMATE FACTS ALLEGED

18. As described above, Quantum has offered to sell the output of the Pasco Facility to Seminole pursuant to tolling agreement options at rates that are cost-effective as compared to the Seminole Combined Cycle Facility and as compared to Seminole's proposed power purchases from the Shady Hills Facility. Quantum has also offered to sell the Pasco Facility to Seminole at a price or cost that is cost-effective as compared to the cost of the Seminole Combined Cycle Facility and the Shady Hills Facility. The Pasco Facility is a proven, reliable combined cycle plant that has operated reliably in the Florida bulk power grid for nearly 25 years. The risk profiles of Seminole's either purchasing the output of the Pasco Facility, or purchasing the Pasco Facility outright, are favorable when compared to the cost of new construction. Seminole's Proposed Resource Plan would uneconomically duplicate the capacity of the Pasco Facility, which is already operating reliably within the Florida bulk power supply grid. Accordingly, Quantum believes that Seminole and its Members and Member-Consumers will be better served by Seminole purchasing the Pasco Facility, or purchasing its output, and that the public interest of all Floridians in avoiding the uneconomic duplication of generation facilities will

best be served by Seminole purchasing the Pasco Facility, or the Facility's output, as offered by Quantum.

STATUTES AND RULES THAT ENTITLE QUANTUM PASCO POWER, L.P.
TO RELIEF

19. The applicable statutes and rules that entitle Quantum to relief include, but are not limited to, Sections 120.569, 120.57(1), 366.04(5), and 403.519, Florida Statutes, and Chapter 28-106, F.A.C. The cited rules provide that persons whose substantial interests will be affected by agency action are entitled to intervene in the proceedings in which such action will be considered and may be taken. Section 366.04(5), Florida Statutes, provides that the Commission is to prevent the "further uneconomic duplication of generation . . . facilities." To fulfill this mandate, at least where there is other capacity available within the Florida grid, the Commission must necessarily consider whether any proposed power plant is the most cost-effective alternative available for meeting the utility's projected needs for electric capacity and energy; if more cost-effective capacity exists in the Florida grid, then Seminole's Proposed Resource Plan would be uneconomic, and uneconomically duplicative of the cost-effective existing capacity. This mandate necessarily includes consideration of other power supply alternatives that may be more cost-effective than Seminole's proposal. Section 403.519, Florida Statutes, establishes the criteria the Commission must consider in determining the need for

an electrical power plant in Florida, including the need for electric system reliability and integrity, the need for adequate electricity at a reasonable cost, the need for fuel diversity and supply reliability, whether the proposed plant is the most cost-effective alternative available, whether renewable energy sources and technologies, as well as conservation measures, are utilized to the extent reasonably available, and other relevant factors within the Commission's jurisdiction. The avoidance of uneconomic duplication of generating facilities is obviously a relevant factor within the Commission's jurisdiction that should, arguably must, be considered in any need determination proceeding.

20. Statement Explaining How the Facts Alleged By Quantum Entitle Quantum to the Relief Requested. Rule 28-106.205, F.A.C., provides that persons whose substantial interests are subject to determination in, or may be affected through, an agency proceeding are entitled to intervene in such proceeding.

In its proposal submitted in response to Seminole's RFP, Quantum offered to sell Seminole both the output of the Pasco Facility, through a tolling agreement, and the Pasco Facility asset itself in lieu of Seminole building duplicative capacity or seeking another new build option. Applying the Commission's reasoning in the Cypress Energy Partners need case, in which intervention was granted, in the absence of the Bid Rule or any rule like it, upon

facts that are substantively identical to those that exist here, the Commission must grant Quantum's motion to intervene: Just as in Cypress Energy Partners, since Quantum's proposals were rejected by Seminole, Quantum's substantial interests in operating its Pasco Facility within the Florida bulk power grid to meet Seminole's needs will be determined by the Commission in this consolidated proceeding. Moreover, as the owner and operator of an existing, reliable, and productive generating asset in the Florida power supply grid, Quantum's interests in avoiding the uneconomic duplication of the Pasco Facility will be determined by the Commission's decision in this docket; if Seminole's Petitions were granted, Quantum's substantial interests would be directly and adversely affected. Therefore, the interests that Quantum seeks to protect via its intervention and participation in this case are immediate and of the type to be protected by this consolidated proceeding, and accordingly, Quantum is entitled to intervene to protect its interests.

STATEMENT PURSUANT TO RULE 28-106.204(3), F.A.C.

21. Pursuant to Rule 28-106.204(3), F.A.C., the undersigned have conferred (by electronic mail) with counsel for Seminole and Shady Hills and hereby report that Seminole and Shady Hills reserve their rights to oppose Quantum's motion to intervene, pending review of the motion when it is filed.

CONCLUSION AND RELIEF REQUESTED

WHEREFORE, Quantum respectfully requests the Commission to enter its order GRANTING this motion to intervene and requiring that all parties to this proceeding serve copies of all pleadings, notices, and other documents to Quantum's representatives indicated in paragraph 2 above.

Respectfully submitted this 17th day of January 2018.

A handwritten signature in blue ink that reads "Robert Scheffel Wright". The signature is written in a cursive style and is positioned above a horizontal line.

Robert Scheffel Wright
schef@gbwlegal.com

John T. LaVia, III
jlavia@gbwlegal.com

Gardner, Bist, Bowden, Bush,
Dee, LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
Telephone (850) 385-0070
Facsimile (850) 385-5416

Attorneys for Quantum Pasco Power, L.P.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following by electronic mail on this 17th day of January 2018.

Rachael Dziechciarz (rdziechc@psc.state.fl.us)
Stephanie Cuello (scuello@psc.state.fl.us)
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Boulevard
Tallahassee, Florida 32390

Gary V. Perko (gperko@hgslaw.com)
Brooke E. Lewis (blewis@hgslaw.com)
Malcolm N. Means (mmeans@hgslaw.com)
Hopping Law Firm
P.O. Box 6526
Tallahassee, Florida 32314

David Ferrentino (Dferrentino@seminole-electric.com)
Seminole Electric Cooperative, Inc.
16313 North Dale Mabry Highway
Tampa, Florida 33618

Trudy Novak (tnovak@seminole-electric.com)
Seminole Electric Cooperative, Inc.
P.O. Box 272000
Tampa, Florida 33688


Attorney