

Shawna Senko

From: Pam Keillor <pkeillor@radeylaw.com>
Sent: Tuesday, October 08, 2013 2:03 PM
To: Filings@psc.state.fl.us
Cc: Rosanne Gervasi; schef@gbwlegal.com; jlavie@gbwlegal.com;
apepper@serenewablesfuels.com
Subject: Docket No. 132035-EQ - Joint Motion to Address the Commission
Attachments: Motion to Address the Comm.pdf

- a. Person responsible for this electronic filing:

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- b. Docket No. 132035-EQ – In re: Petition of Southeast Renewable Fuels, LLC, for a Declaratory Statement Regarding Co-Ownership of Electrical Cogeneration Facilities in Hendry County.
- c. Document being filed on behalf of Tampa Electric Company, Florida Power & Light Company, and Gulf Power Company.
- d. There are a total of 3 pages.
- e. The document attached for electronic filing is the Joint Motion of Tampa Electric Company, Florida Power & Light Company, and Gulf Power Company to Address the Commission.

(See attached file: Motion to Address the Comm)

Thank you for your assistance in this matter.

Pam L. Keillor, FRP

Paralegal to Susan F. Clark and Travis L. Miller

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Southeast Renewable)
Fuels, LLC, for a Declaratory Statement)
Regarding Co-Ownership of Electrical)
Cogeneration Facilities in Hendry County.)
_____)

DOCKET NO. 130235-EQ

FILED: October 8, 2013

**JOINT MOTION OF
TAMPA ELECTRIC COMPANY, FLORIDA POWER & LIGHT COMPANY,
AND GULF POWER COMPANY TO ADDRESS THE COMMISSION**

Pursuant to Rule 25-22.0021(7), F.A.C., Tampa Electric Company ("Tampa Electric"), Florida Power & Light Company ("FPL"), and Gulf Power Company ("Gulf Power") (collectively "Joint Movants") move the Florida Public Service Commission ("Commission") for permission to address the Commission regarding the issues raised by the declaratory statement petition filed by Southeast Renewable Fuels, LLC ("Southeast") in this proceeding. Joint Movants respectfully submit that their participation in the Agenda Conference at which Southeast's Petition is considered will facilitate the Commission's deliberation of the issues raised by Southeast. The Petition raises significant issues with respect to the statutory basis for and policy implications of the declaration requested which have not previously been considered by this current Commission.

On October 8, 2013, the Joint Movants filed a motion for leave to file an amici curiae memorandum of law and the amici curiae memorandum addressing the Southeast petition.

Joint Movants seek to address the Commission to explain their positions and answer questions regarding their amici curiae memorandum. More specifically, the opportunity to address the Commission regarding the Petition will (a) facilitate the Commission's deliberation

and evaluation of the issues raised, and (b) aid in the Commission's understanding of the serious deficiencies in the Petition and the impact the disposition of the Petition will have on:

1. The general body of customers served by the Joint Movants;
2. The ability of the Joint Movants to carry out their statutory duty to provide retail electric customers with safe, reliable and reasonably priced electric service; and
3. Ensuring that the Joint Movants' retail territorial rights are protected and that the obligation to serve within the respective retail service areas is not adversely affected.

WHEREFORE, the Joint Movants respectfully request that they be granted the opportunity to address the Commission as an Amici Curiae on the issues raised in the declaratory statement petition.

DATED this 8th day of October 2013.

Respectfully submitted,

s/ Susan F. Clark
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ATTORNEY FOR TAMPA ELECTRIC COMPANY,
FLORIDA POWER & LIGHT COMPANY, AND GULF
POWER COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Joint Motion of Tampa Electric Company, Florida Power & Light Company, and Gulf Power Company to Address the Commission has been furnished by electronic mail on this 8th day of October 2013, to the following:

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