

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for a Limited Proceeding to  
Approve Large Load Tariff by Duke Energy  
Florida, LLC

DOCKET NO.: 20250113-EI  
Filed: March 18, 2026

**PETITION TO INTERVENE OF  
SEMINOLE ELECTRIC COOPERATIVE, INC.**

Pursuant to Sections 120.569 and 120.57, Florida Statutes and Rule 28-106.205, Florida Administrative Code, Seminole Electric Cooperative, Inc. (“Seminole”), through its undersigned attorneys, files its Petition to Intervene in the above captioned proceeding. In support thereof, Seminole states as follows:

1. The name and address of the affected agency is:

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

2. The name and address of the petitioner is:

Seminole Electric Cooperative, Inc.  
16313 North Dale Mabry, Hwy.  
Tampa, FL 33688-2000

3. All pleadings, motions, orders, and other documents directed to the petitioner should be served on:

David Ferrentino  
Shayla McNeill  
Bret Galbraith  
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4. Statement of Affected Interests. Seminole is a not-for-profit electric generation and transmission cooperative organized under the Rural Electric Cooperative Law of Florida (Fla. Stat. § 425). Seminole supplies wholesale electric power and energy to nine not-for-profit, rural distribution cooperatives located in Florida. Seminole's wholesale service is utilized to provide retail electric service to approximately 1.9 million people and businesses in parts of 42 Florida counties. Seminole is an electric transmission customer of Duke Energy Florida, LLC ("DEF") and is a party to multiple electric transmission related agreements with DEF.

5. On September 5, 2025, DEF filed a Petition for a limited proceeding to approve a new Large Load Customer Rate Schedule (LLC-1), Large Load Customer Policy (LLCP), and Large Load Customer Agreement (LLCA). DEF proposes a new customer class and optional rate schedule LLC-1 that would be applicable to customers with a billing demand of 1,000 kW or more requesting transmission level service. DEF, in its Petition, states that customers in the LLC rate class will take delivery of power at 230 kV or above and that DEF asserts that it anticipates that it may be requested to provide the services specified within the Petition for large loads, and that such services, with nothing more, may impact all customers. In this case, the Florida Public Service Commission (Commission) will consider how to protect existing customers from undue impacts and risks that may be associated with service to large loads. More specifically, DEF's proposal has the potential to socialize costs across existing customer rate classes because

all rate classes pay for the high-voltage transmission system. Under the LLC-1 rate design proposal, DEF is proposing to divide its transmission assets and expenses by voltage level into transmission-level voltage (230 kV or higher) and subtransmission-level voltage categories, potentially implicating the transmission rates DEF charges to Seminole. Therefore, among other things, as an existing transmission customer of DEF who may be directly or indirectly impacted by DEF's pending proposal to address the addition of large loads, the outcome of this proceeding will have a direct and substantial impact on Seminole. Seminole seeks to intervene in this proceeding to ensure that DEF's large load proposal will not disproportionately affect Seminole's rates.

6. Moreover, as DEF indicated in its March 16, 2026 Motion for Abatement of the Procedural Schedule, there may be additional changes to DEF's proposed large load tariff necessitated if Senate Bill 484: Data Centers ("Data Center Bill") becomes law. Given the uncertain status of what changes will be made to DEF's proposal, Seminole may be further impacted.

7. Disputed Issues of Material Fact. Seminole is not aware of any disputed issues of material fact at this state of the proceeding. However, Seminole anticipates that disputed issues of material fact may be identified over the course of the proceeding, and Seminole reserves the right to identify such issues.

8. Disputed Legal Issues: Seminole is not aware of any disputed legal issues at this stage of proceeding. However, Seminole anticipates that disputed legal issues may be identified over the course of the proceeding, and Seminole reserves the right to identify such issues.

9. Statement of Ultimate Facts Alleged. Ultimate facts alleged and at issue, include, but are not limited to whether DEF's Petition protects existing customers from undue impacts that may be associated with service to large loads.
10. Laws Entitling Petitioner to Relief and Relation to Alleged Facts. The rules and statutes entitling Seminole to relief include but are not necessarily limited to the following: Sections 120.569 and 120.57(1), Florida Statutes, Sections 366.04 through 366.07, Florida Statutes, Section 366.041, Florida Statutes, Rule 28-106.201, Florida Administrative Code, and Rule 28-106.205, Florida Administrative Code.
11. Statement of Conferral. In accordance with Rule 28-106.204(3), Florida Administrative Code, Seminole has conferred with all parties to this proceeding regarding Seminole's intervention. Concerning Seminole's intervention, Nucor Steel Florida, Inc. and White Springs Agricultural Chemicals, d/b/a PCS Phosphate-White Springs take no position, Florida Industrial Power Users Group does not object, the Office of Public Counsel takes no position but reserves their right to object after reviewing the filed petition, and Duke Energy Florida, LLC objects.
12. Notice of Proceeding. Seminole received notice of this docket by an informal communication and subsequent review of DEF's September 5, 2025 filed Petition.
13. Relief. Seminole requests that it be permitted to intervene as a full party in this docket.

WHEREFORE, Seminole respectfully requests that the Commission enter an order allowing it to intervene as a full party in this docket.

Respectfully Submitted,

/s/ Bret Galbraith

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Shayla McNeill

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**Certificate of Service**

I hereby certify that a true copy of the foregoing Petition to Intervene has been furnished by electronic mail and/or U.S. Mail this 18<sup>th</sup> day of March, 2026, to the following:

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/s/ Bret Galbraith

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