

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Commission review of numeric conservation goals (Duke Energy Florida, LLC)

Docket No. 20240013-EG

Dated: March 21, 2024

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**DUKE ENERGY FLORIDA, LLC'S  
RESPONSE TO FLORIDA RISING, LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS, & ENVIRONMENTAL CONFEDERATION OF SOUTHWEST FLORIDA'S  
PETITION TO INTERVENE**

Duke Energy Florida, LLC, (“DEF”) by and through its undersigned counsel hereby responds to the Petition to Intervene filed by Florida Rising, Inc. (“Florida Rising”), League of United Latin American Citizens of Florida (“LULAC”), and the Environmental Confederation of Southwest Florida, Inc. (“ECOSWF”) and in support thereof states as follows:

1. On March 15, 2024, Florida Rising, LULAC and ECOSWF filed a Petition to Intervene in docket number 20240013-EG.
2. In its Petition, Florida Rising and LULAC allege they have standing due to a substantial number of members in DEF’s service territory who will be substantially affected by the outcome of this proceeding.
3. DEF reserves the right to test Florida Rising and LULAC's allegations of associational standing in discovery, should the Commission approve its intervention in that capacity.

WHEREFORE, DEF respectfully requests that should the Commission grant Florida Rising and LULAC’s Petition to Intervene, that the Commission allow DEF to test Florida Rising and LULAC’s associational standing in discovery.

Respectfully submitted this 21<sup>st</sup> day of March, 2024.

*/s/ Stephanie A. Cuello*

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**DIANNE M. TRIPLETT**

Deputy General Counsel

299 First Avenue North

St. Petersburg, FL 33701

T: 727. 820.4692

F: 727.820.5041

E: [Dianne.Triplett@Duke-Energy.com](mailto:Dianne.Triplett@Duke-Energy.com)

**MATTHEW R. BERNIER**

Associate General Counsel

106 E. College Avenue, Suite 800

Tallahassee, FL 32301

T: 850.521.1428

F: 727.820.5041

E: [Matt.Bernier@Duke-Energy.com](mailto:Matt.Bernier@Duke-Energy.com)

**STEPHANIE A. CUELLO**

Senior Counsel

106 East College Avenue

Suite 800

Tallahassee, Florida 32301

T: (850) 521-1425

F: (727) 820-5041

E: [Stephanie.Cuello@duke-energy.com](mailto:Stephanie.Cuello@duke-energy.com)

[FLRegulatoryLegal@duke-energy.com](mailto:FLRegulatoryLegal@duke-energy.com)

Attorneys for Duke Energy Florida, LLC

**CERTIFICATE OF SERVICE**

*Docket No. 20240013-EI*

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 21<sup>st</sup> day of March, 2024, to the following:

/s/ Stephanie A. Cuello  
Stephanie A. Cuello

<p>Jacob Imig / Jonathan Rubottom Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <a href="mailto:jimig@psc.state.fl.us">jimig@psc.state.fl.us</a> <a href="mailto:JRubotto@psc.state.fl.us">JRubotto@psc.state.fl.us</a> <a href="mailto:discovery-gcl@psc.state.fl.us">discovery-gcl@psc.state.fl.us</a></p> <p>James W. Brew / Laura Wynn Baker / Sarah B. Newman Stone Mattheis Xenopoulos &amp; Brew, PC PCS Phosphate – White Springs 1025 Thomas Jefferson Street, NW Suite 800 West Washington, DC 20007-5201 <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a> <a href="mailto:lwb@smxblaw.com">lwb@smxblaw.com</a> <a href="mailto:sbn@smxblaw.com">sbn@smxblaw.com</a></p>	<p>Walt Trierweiler / Patricia A. Christensen Office of Public Counsel 111 West Madison Street, Suite 812 Tallahassee, FL 32399-1400 <a href="mailto:trierweiler.walt@leg.state.fl.us">trierweiler.walt@leg.state.fl.us</a> <a href="mailto:christensen.patty@leg.state.fl.us">christensen.patty@leg.state.fl.us</a></p>
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