

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Rate Increase)
By Tampa Electric Company) DOCKET NO. 20240026-EI
_____) FILED: AUGUST 22, 2024

JOINT MOTION FOR APPROVAL OF STIPULATION

Florida Rising, Inc. (“Florida Rising”), the League of United Latin American Citizens of Florida (“LULAC”), and the Florida Retail Federation, pursuant to Rule 28-106.204, Florida Administrative Code, hereby jointly move the Commission to admit the testimony and exhibits of the Florida Retail Federation’s Witness Steve Chriss into the record of this proceeding, to approve the following stipulations in lieu of cross-examination of Witness Chriss, and to excuse Witness Chriss from appearing at the hearing scheduled for this case. The stipulations to which Florida Rising, LULAC, and the FRF have agreed are as follows:

1. Although Witness Chriss testified that the FRF does not oppose the 4CP and MDS cost of service methodology, Witness Chriss did not testify that the FRF supports that methodology;
2. Witness Chriss did not conduct his own cost-of-service study for this case;
3. Witness Chriss did not evaluate the energy value versus the capacity value of the solar power plants that TECO is adding to its grid; and
4. Witness Chriss did not evaluate how much of TECO’s generation investments are comprised of solar.

The FRF is agreeable to this stipulation being entered into the record, subject to the Commission’s approval, and Florida Rising and LULAC are agreeable to waiving cross-examination of Mr. Chriss. The foregoing stipulations are provided in lieu of cross-examination that Florida Rising and LULAC would otherwise conduct of Witness Chriss and do not change the positions of any of the Movants. Accordingly, the Movants request that the Commission excuse Mr. Chriss from appearing at the hearing.

The Movants have conferred with all parties, some via direct conversation and some via electronic mail, regarding this motion, and no party objects. Specifically, the following parties do not object to the motion and do not object to Mr. Chriss being excused from appearing at the hearing; the Commission Staff, the Office of Public Counsel, Tampa Electric Company, the Florida Industrial Power Users Group, Walmart, Inc., the Federal Executive Agencies, the parties collectively known as the Fuel Retailers (Wawa, Inc., RaceTrac, Inc., Americans for Affordable Clean Energy, Inc., and Circle K Stores, Inc.), and the Sierra Club.

WHEREFORE, Florida Rising, LULAC, and the FRF respectfully move the Commission to approve this stipulation and to enter it into the record of this docket, and to excuse Mr. Chriss from appearing at the hearing.

Respectfully submitted this 22nd day of August, 2024.

/s/ Robert Scheffel Wright

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 22nd day of August, 2024, to the following:

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