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RECEIVED FPSC  
11 OCT -7 PM 3:09  
COMMISSION  
CLERK

October 7, 2011

HAND DELIVERED

Ms. Ann Cole, Director  
Division of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Energy Conservation Cost Recovery Clause  
FPSC Docket No. 110002-EG

Dear Ms. Cole:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Response to Southern Alliance for Clean Energy's Petition to Intervene.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,



James D. Beasley

JDB/pp  
Enclosure

cc: All Parties of Record (w/enc.)

COM \_\_\_\_\_  
APA 11  
ECR 2  
GCL 2  
RAD \_\_\_\_\_  
SRC \_\_\_\_\_  
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DOCUMENT NUMBER DATE

07361 OCT-7 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost )  
Recovery Clause. )  
\_\_\_\_\_ )

DOCKET NO. 110002-EG  
FILED: October 7, 2011

**TAMPA ELECTRIC COMPANY'S RESPONSE TO SOUTHERN  
ALLIANCE FOR CLEAN ENERGY'S PETITION TO INTERVENE**

Tampa Electric Company ("Tampa Electric" or "the company") responds as follows to the Petition to Intervene filed October 3, 2011 in this docket on behalf of Southern Alliance for Clean Energy ("SACE"):

1. Tampa Electric does not object to SACE's intervention in this docket but, instead, disagrees with SACE's alleged disputed issues of material fact and its proposed inclusion of Issues 7 through 11 set forth in SACE's Preliminary List of Issues and Positions, also filed in this proceeding on October 3, 2011.

2. SACE's alleged disputed issues of material fact and additional generic issues represent an attempt to revisit the appropriateness of demand side management ("DSM") measures included in Commission approved DSM plans. Tampa Electric's current DSM plan and all of the individual measures that make up that plan were approved in December 2010, and SACE was a party to the proceeding in which that approval was granted.<sup>1</sup>

3. The ECCR cost recovery docket is a proceeding to consider the appropriate cost recovery factors to implement approved DSM plans and the measures they include – not a proceeding in which to revise existing DSM plans or measures.

WHEREFORE, Tampa Electric submits the foregoing Response to SACE's Petition to Intervene.

<sup>1</sup> Order No. PSC-10-0736-PAA-EG dated December 20, 2010 in Docket No. 100159-EG

DOCUMENT NUMBER-DATE

07361 OCT-7 =

FPSC-COMMISSION CLERK

DATED this 7<sup>th</sup> day of October 2011.

Respectfully submitted,



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Ausley & McMullen  
Post Office Box 391  
Tallahassee, Florida 32302  
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing Response to SACE's Petition to Intervene, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (\*) on this 7<sup>th</sup> day of October 2011 to the following:

Ms. Lee Eng Tan\*  
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Florida Public Service Commission  
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