

AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

March 18, 2014

HAND DELIVERED

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14 MAR 18 PM 1:54
COMMISSION
CLERK

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Commission review of numeric conservation goals
(Tampa Electric Company); FPSC Docket No. 130201-EI

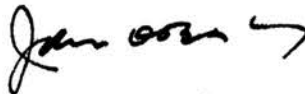
Dear Ms. Stauffer:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Memorandum in Opposition to Sierra Club's Motion to Extend Intervenors' Testimony Deadline, Expedite discovery, and Promote Public Engagement.

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

COM	_____	JDB/pp
AFD	<u> 1 </u>	Enclosure
APA	_____	cc: All Parties of Record (w/enc.)
ECO	<u> 1 </u>	
ENG	<u> 11 </u>	
GCL	<u> 1 </u>	
IDM	<u> 1 </u>	
TEL	_____	
CLK	_____	

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals (Florida Power & Light Company)	DOCKET NO. 130199-EI
In re: Commission review of numeric conservation goals (Duke Energy Florida, Inc.	DOCKET NO. 130200-EI
In re: Commission review of numeric conservation goals (Tampa Electric Company)	DOCKET NO. 130201-EI
In re: Commission review of numeric conservation Goals (Gulf Power Company)	DOCKET NO. 130202-EI
In re: Commission review of numeric conservation goals (JEA)	DOCKET NO. 130203-EM
In re: Commission review of numeric conservation goals (Orlando Utilities Commission)	DOCKET NO. 130204-EM
In re: Commission review of numeric conservation goals (Florida Public Utilities Company)	DOCKET NO. 130205-EI
	FILED: March 18, 2014

**TAMPA ELECTRIC COMPANY'S
MEMORANDUM IN OPPOSITION TO SIERRA CLUB'S
MOTION TO EXTEND INTERVENORS' TESTIMONY DEADLINE,
EXPEDITE DISCOVERY, AND PROMOTE PUBLIC ENGAGEMENT**

Tampa Electric Company ("Tampa Electric" of "the company"), pursuant to Rule 28-106.204, Florida Administrative Code, submits this its Memorandum in Opposition to Sierra Club's Motion to extend Intervenors' Testimony Deadline, Expedite Discovery, and Promote Public Engagement, and says:

1. Tampa Electric opposes Sierra Club's Motion to alter the schedule set forth in the Order Establishing Procedure and to expand the hearing beyond that contemplated in such order.

All stakeholders in this process have been apprised of the schedule for this proceeding since August 19, 2013, when the Order Establishing Procedure ("OEP") was issued.

2. Sierra Club erroneously states that the FEECA utilities are five months behind on producing their updated Technical Potential Studies. There is no requirement at all in this proceeding that Technical Potential Studies be submitted in advance of direct testimony now due April 2, 2014 – only two weeks away.

3. As Sierra Club notes on page 4 of its Motion, it petitioned for leave to intervene in this proceeding on December, 18, 2013. Sierra Club could have availed itself of data requests to Tampa Electric, but refrained from doing so. The Southern Alliance for Clean Energy ("SACE") did send a data request and Tampa Electric responded in early November of 2013. Tampa Electric gratuitously provided Sierra Club its response to SACE's data request.

4. As an intervenor, Sierra Club takes this case as it finds it. Attempting to restructure the schedule for this proceeding some seven months after the Order Establishing Procedure and only two weeks ahead of the utilities' filing of testimony and exhibits is inappropriate and should be denied.

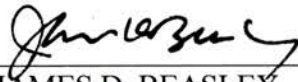
5. Sierra Club's effort to expand the hearing schedule beyond that set forth in Order No. PSC-14-0112-PCO-EU is unwarranted, would cause the Commission and parties to incur undue efforts and expense and should be denied. All stakeholders in the goal setting process will have a full opportunity to be represented at the hearing as currently scheduled.

6. With respect to Sierra Club's request that discovery be expedited, Tampa Electric is willing to consider providing Sierra Club responses to discovery in a shorter period of time than the standard 30 days, depending upon the level of discovery put forth.

WHEREFORE, Tampa Electric Company urges that Sierra Club's Motion to Extend Intervenors' Testimony Deadline and request for a separate hearing beyond that set forth in Order No. PSC-14-0112-PCO-EU be denied. Tampa Electric further suggests that oral argument is unnecessary for the disposition of Sierra Club's Motion.

DATED this 18th day of March 2014.

Respectfully submitted,



JAMES D. BEASLEY
J. JEFFRY WAHLEN
ASHLEY M. DANIELS
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 and correct copy of the foregoing Memorandum in Opposition, filed on behalf of Tampa Electric Company, has been furnished electronically this 18th day of March 2014 to the following:

Ms. Shalonda Hopkins
Mr. Charles Murphy
Ms. Theresa Tan
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
shopkins@psc.state.fl.us
cmurphy@psc.state.fl.us
ltan@psc.state.fl.us

Mr. John Butler
Ms. Jessica Cano
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408
John.Butler@FPL.com
Jessica.Cano@fpl.com

Mr. Kevin Donaldson
Principal Attorney
Florida Power & Light Company
4200 West Flagler Street
Miami, FL 33134
Kevin.Donaldson@fpl.com

Mr. Matthew R. Bernier
Ms. Dianne Triplett
Duke Energy Florida, Inc.
106 East College Avenue, Suite 800
Tallahassee, FL 32301-7740
matthew.bernier@duke-energy.com
dianne.triplett@duke-energy.com

Mr. Robert L. McGee, Jr.
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0780
rlmcgee@southernco.com

Mr. Steven L. Hall
Senior Attorney
Florida Department of Agriculture and
Consumer Services
Office of General Counsel
407 South Calhoun Street, Suite 520
Tallahassee, FL 32399
Steven.Hall@FreshFromFlorida.com

Ms. Paula K. Brown, Manager
Regulatory Coordination
Regulatory Affairs
Tampa Electric Company
P. O. Box 111
Tampa, FL 33601
Regdept@tecoenergy.com

Mr. P. G. Para
JEA
21 West Church Street, Tower 16
Jacksonville FL 32202-3158
parapg@jea.com

Ms. Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

Ms. Cheryl M. Martin
Florida Public Utilities Company
1641 Worthington Road, Suite 220
West Palm Beach, FL 33409-6703
cmmartin@fpuc.com

Mr. W. Christopher Browder
Orlando Utilities Commission
P. O. Box 3193
Orlando, FL 32802-3193
cbrowder@ouc.com

Ms. Alisa Coe
Mr. David G. Guest
Attorneys for SACE
Earthjustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, FL 32302
acoe@earthjustice.org
dguest@earthjustice.org

Mr. George Carvos
Southern Alliance for Clean Energy
120 E. Oakland Park Blvd., #105
Fort Lauderdale, FL 33334
george@cavros-law.com

Mr. Jon C. Moyle, Jr.
Ms. Karen Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Mr. James W. Brew
Mr. F. Alvin Taylor
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007-5201
jbrew@bbrslaw.com
ataylor@bbrslaw.com

Ms. Diana Csank
Associate Attorney
Sierra Club
50 F St. NW, 8th Floor
Washington, DC 20001
Diana.Csank@sierraclub.org

Mr. Gary V. Perko
Ms. Brooke E. Lewis
Hopping Green & Sams, P.A.
Post Office Box 6526
Tallahassee, FL 32314
gperko@hgslaw.com
blewis@hgslaw.com

Mr. Robert Scheffel Wright
Mr. John T. LaVia, III
Gardner, Bist, Wiener, Wadsworth,
Bowden, Bush, Dee, LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, FL 32308
Schef@gbwlegal.com
Jlavia@gbwlegal.com



ATTORNEY