FILED MAR 20, 2014 DOCUMENT NO. 01222-14 FPSC - COMMISSION CLERK

AUSLEY & MCMULLEN

RECEIVED-FPSC

ATTORNEYS AND COUNSELORS AT LAW

14 MAR 20 AM 10: 18

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

March 20, 2014

HAND DELIVERED

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 Response in Opposition to Southern Alliance for Clean Energy's Motion to Extend Intervenors' Filing Deadline.

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,

COM

AFD

James D. Beasley

APA

ECO

I

ENG

II

GCL

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

DOCKET NO. 130205-EI

goals (Florida Public Utilities Company)

FILED: March 20, 2014

TAMPA ELECTRIC COMPANY'S RESPONSE IN OPPOSITION TO SOUTHERN ALLIANCE FOR CLEAN ENERGY'S MOTION TO EXTEND INTERVENORS' FILING DEADLINE

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Rule 28-106.204(1), Florida Administrative Code, hereby responds in opposition to Southern Alliance for Clean Energy's ("SACE's") Motion to Extend Intervenors' Filing Deadline, and says:

1. SACE's motion, like the motion filed on behalf of the Sierra Club, would cause unnecessary delay to these proceedings. 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. SACE's motion seeks to extend the deadline for intervenors to file their testimony until at least May 19, 2014. However, SACE has put forth no reasonable basis to alter the long established schedule in this proceeding at this late date. Indeed, SACE commenced discovery efforts in early November of last year, evidencing its awareness of the current schedule and original intent to gather information and comply with the schedule.
- If SACE believed that the long established schedule in these proceedings was inadequate, those concerns could and should have been raised in a timely fashion, some six and one half months ago.

WHEREFORE, for the reasons stated above, Tampa Electric respectfully submits that SACE's Motion to Extend Intervenors' Filing Deadline should be denied.

DATED this 20 tag 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

- h (An 36) - -

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Response in Opposition, filed on behalf of Tampa Electric Company, has been furnished electronically this 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 <u>cbrowder@ouc.com</u> 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