

D. STATEMENT OF BASIC POSITION

PCS Phosphate generally adopts the positions taken by the Florida Office of Public Counsel (“OPC”).

E. STATEMENT ON SPECIFIC ISSUES

GENERIC CONSERVATION COST RECOVERY ISSUES

DUKE ENERGY FLORIDA

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2014 through December 2014?

PCS Phosphate: PCS agrees with the Office of Public Counsel.

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the period January 2016 through December 2016?

PCS Phosphate: No position at this time.

ISSUE 3: What are the conservation cost recovery factors for the period January 2016 through December 2016?

PCS Phosphate: No position at this time.

ISSUE 4: What should be the effective date of the new conservation cost recovery factors for billing purposes?

PCS Phosphate: No position.

COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES

Tampa Electric Company

ISSUE 5: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2016 through December 2016?

PCS Phosphate: No position.

ISSUE 6: What are the residential Price Responsive Load Management (RSVP -1) rate

tiers for Tampa Electric Company for the period January 2016 through December 2016?

PCS Phosphate: No position.

Generic Issues

ISSUE 7: Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding?

PCS Phosphate: No position.

F. PENDING MOTIONS

None.

G. PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

None.

H. OBJECTIONS TO QUALIFICATIONS OF WITNESS AS EXPERT

None at this time.

I. REQUIREMENTS OF ORDER ESTABLISHING PROCEDURE

There are no requirements of the Procedural Order with which PCS Phosphate cannot comply.

Respectfully submitted

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Dated: October 9, 2015

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Petition to Intervene has been furnished by electronic mail and/or U.S. Mail this 9th day of October 2015 to the following:

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